Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

MLM, PWS, WQ

Small Business:

Nc

Location(s) Where Violation(s) Occurred:

Located north of United States Highway 80 and west of Farm-to-Market Road 47, Van Zandt County

Type of Operation:

Municipal public water supply

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: Senator Robert Deuell **Texas Register Publication Date:** April 22, 2011

Comments Received: No

Penalty Information

Total Penalty Assessed: \$14,606

Amount Deferred for Expedited Settlement: \$2,921 Amount Deferred for Financial Inability to Pay: \$0

Total Paid to General Revenue: \$0 Total Due to General Revenue: \$0 SEP Conditional Offset: \$11,685

Name of SEP: Household Hazardous Waste, Electronics, and Appliance Collection Event

Compliance History Classifications:

Person/CN - Average

Site/RN - N/A

Major Source: WQ: No

PWS: Yes

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: September 2002

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Investigation Information

Complaint Date(s): N/A Complaint Information: N/A

Date(s) of Investigations: July 21, 2010, July 22, 2010, and July 27, 2010

Date(s) of NOE(s): September 24, 2010

Violation Information

- 1. Failed to prevent an unauthorized discharge of sewage, municipal waste, recreational waste, agricultural waste, or industrial waste into or adjacent to any water in the state [Tex. Water Code § 26.121].
- 2. Failed to provide an air gap connection to waste on the filter-to-waste connections [30 Tex. Admin. Code § 290.42(d)(2)(E)].
- 3. Failed to design the inlet and outlet of clarification facilities so as to prevent short-circuiting of flow or the destruction of floc [30 Tex. Admin. Code § 290.42(d)(10)(B)].
- 4. Failed to provide a rate of flow of backwash water that is at least 20 inches vertical rise per minute [12.5 gallons per minute ("gpm") per square foot] and usually not more than 35 inches of vertical rise per minute (21.8 gpm per square foot) [30 Tex. ADMIN. CODE § 290.42(d)(11)(F)(iii)].
- 5. Failed to provide backwash facilities capable of expanding a mixed-media filter bed without air scour at least 25% during the backwash cycle [30 Tex. Admin. Code § 290.42(d)(11)(F)(iv)(II)].
- 6. Failed to identify the influent, effluent, waste backwash, and chemical feed lines by the use of labels or various colors of paint [30 Tex. Admin. Code § 290.42(d)(13)].
- 7. Failed to provide a device on all chemical bulk storage facilities and day tanks that indicates the amount of chemical remaining in the facility or tank [30 Tex. Admin. Code § 290.42(f)(1)(C)].
- 8. Failed to provide adequate containment facilities for all liquid chemical storage tanks [30 Tex. Admin. Code § 290.42(f)(1)(E)(ii)].
- 9. Failed to use a chemical feed system designed to minimize the possibility of leaks and spills and provide protection against backpressure and siphoning [30 Tex. ADMIN. CODE § 290.42(f)(2)(D)].
- 10. Failed to maintain the Facility's operating records accessible for review during inspections [30 Tex. Admin. Code §§ 290.46(f)(2), 290.46(f)(3)(B)(vi), and 290.46(f)(3)(B)(v)].

- 11. Failed to obtain prior approval from the Executive Director before using an alternative customer service inspection certification form [30 Tex. Admin. Code § 290.46(j)].
- 12. Failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment [30 Tex. Admin. Code § 290.46(m)].
- 13. Failed to inspect the interior coating of the elevated storage tanks for adequate protection to all metal surfaces on an annual basis [30 Tex. ADMIN. CODE § 290.46(m)(1)(A)].
- 14. Failed to maintain all water treatment units, storage and pressure maintenance facilities, distribution system lines, and related appurtenances in a watertight condition and free of excessive solids [30 Tex. Admin. Code 290.46(m)(4)].
- 15. Failed to properly calibrate equipment used for compliance testing [30 TEX. ADMIN. CODE §§ 290.46(s)(2), 290.46(s)(2)(A)(ii), and 290.46(s)(2)(B)(iv)].
- 16. Failed to maintain the residual disinfectant concentration within the distribution system at a minimum of 0.5 milligrams per liter ("mg/L") chloramine [30 Tex. Admin. Code § 290.110(b)(4)].
- 17. Failed to monitor the performance of the disinfection zones according to the Facility's most current monitoring plan and current disinfection contact time ("CT") study approval letter [30 Tex. Admin. Code § 290.111(d)(2)(B)].
- 18. Failed to maintain an up-to-date chemical and microbiological monitoring plan that identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures and laboratories that the Facility will use to comply with monitoring requirements [30 Tex. ADMIN. CODE § 290.121(a) and (b)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

The Executive Director recognizes that on July 26, 2010, the Respondent submitted documentation to demonstrate that the disinfectant residual was restored to a level greater than 0.5 mg/L at Industrial Park and Eastside elevated storage tanks.

Technical Requirements:

1. The Order will require the Respondent to implement and complete a Supplemental Environmental Project ("SEP"). (See SEP Attachment A)

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- 2. It is further ordered that the Respondent shall undertake the following technical requirements:
- a. Immediately upon the effective date of this Agreed Order, cease all unauthorized discharges from the surface water treatment plant lagoon and institute controls to prevent any future unauthorized discharges.
- b. Within 30 days:
- i. Inspect the interiors of all elevated storage tanks to ensure the interior coatings provide adequate protection to all metal surfaces;
- ii. Begin maintaining the Facility's operating records, including but not limited to: backflow prevention test reports, and flow meter calibration reports;
- iii. Initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the facilities and equipment. This will include, but not be limited to the following corrective measures: repairing the corrosion and paint on the supply lines feeding the clarifiers, repairing or replacing the modulating valve on filter 1, removing all vegetation growing on the fence close to the old raw water intake, and repairing the containment structure for the caustic day tank;
- iv. Begin using a customer service inspection certification form which provides the minimum information;
- v. Begin monitoring the performance of the disinfection zones according to the Facility's most recent monitoring plan and CT study; and
- vi. Properly calibrate equipment used for compliance testing, including but not limited to the following corrective measures: replace the expired pH buffers and fluoride secondary standards, verify the accuracy of the ammonia calorimeter against secondary standards, calibrate the online turbidimeters, and verify the fluoride test kit against secondary standards.
- c. Within 45 days, submit written certification and include supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provisions a. and b.
- d. Within 60 days:

- i. Provide an appropriate air gap on the filter-to-waste connection at the surface water treatment facility;
- ii. Design the inlet and outlet of clarification facilities so as to prevent short-circuiting of flow or the destruction of floc;
- iii. Provide a rate of flow of backwash water that is at least 20 inches vertical rise per minute (12.5 gpm per square foot) and not more than 35 inches of vertical rise per minute (21.8 gpm per square foot);
- iv. Provide backwash facilities capable of expanding the filtering bed during the backwash cycle;
- v. Identify all settled water lines feeding the clarifiers and all of the chemical injection feed lines by utilizing labels or paint;
- vi. Install a level indicator on the 50% caustic bulk storage tank; and
- vii. Update the chemical and bacteriological monitoring plan so that it identifies all sampling locations, sampling frequency, and specifies the analytical procedures and laboratories the Facility will use to comply with the monitoring requirements.
- e. Within 75 days, submit written certification and include supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision d.
- f. Within 90 days:
- i. Remove all excess solids from the sludge lagoon and begin maintaining the lagoon so that it remains free of excessive solids;
- ii. Provide adequate containment facilities, including secondary containment for the bulk alum storage tank and the liquid ammonium sulfate day tank; and
- iii. Provide a chemical feed system designed to provide protection against backpressure and siphoning.
- g. Within 105 days, submit written certification and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision f.

Litigation Information

Date Petition(s) Filed: N/A Date Answer(s) Filed: N/A SOAH Referral Date: N/A Hearing Date(s): N/A Settlement Date: N/A

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Ms. Michaelle Sherlock, Enforcement Division, Enforcement Team 2, MC R-13, (210) 403-4076; Ms. Laurie Eaves, Enforcement

Division, MC 219, (512) 239-4495

TCEQ SEP Coordinator: Ms. Sharon Blue, SEP Coordinator, Litigation Division, MC

175, (512) 239-2223

Respondent: The Honorable Scott McGriff, Mayor, City of Wills Point, P.O. Box 505,

Wills Point, Texas 75169

Respondent's Attorney: N/A

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Attachment A Docket Number: 2010-1721-MLM-E

SUPPLEMENTAL ENVIRONMENTAL PROJECT

| Respondent: | City of Wills Point |
|--------------------|---|
| Penalty Amount: | Eleven Thousand Six Hundred Eighty-Five Dollars (\$11,685) |
| SEP Offset Amount: | Eleven Thousand Six Hundred Eighty-Five Dollars (\$11,685) |
| Type of SEP: | Custom (Pre-Approved Concept) |
| Project Name: | Household Hazardous Waste, Electronics, and Appliance Collection Event |
| Location of SEP: | Van Zandt County |

The Texas Commission on Environmental Quality ("TCEQ") agrees to offset the administrative Penalty Amount assessed in this Agreed Order for Respondent to contribute to a Supplemental Environmental Project ("SEP"). The SEP Offset Amount is set forth above and such offset is conditioned upon completion of the project in accordance with the terms of this Attachment A.

1. Project Description

A. Project

Respondent shall hold a three-day event for the collecting, recycling and proper disposal of tires, electronics (including non-working televisions), appliances (without Freon) and household hazardous waste ("HHW") including, but not limited to, pesticides, herbicides, paint, various solvents, old batteries, and gasoline and oil products (the "Project"). Secure drop-off sites will be manned by City personnel, and a contracted Haz-Mat certified person to oversee the separation of the HHW material from the collected materials. The City will hire a waste disposal contractor to take the segregated waste to a TCEQ-approved facility located at 5100 Youngblood, Dallas, Texas. Manifests will be provided to show proper transport, recycling and disposal of collected materials.

Respondent shall ensure that the event:

- is advertised to the public; and includes a statement that the Project is being performed as a Supplemental Environmental Project
- occurs during the week and on a specified day of the weekend during daylight hours
- offers to the public a convenient drop-off location, and
- includes recycling of electronics, batteries, and tires

Respondent shall properly collect, transport, dispose of, or recycle the collected material. The SEP Offset Amount will be used for heavy equipment such as roll-off bins, vehicles, and trailers; public announcements of the event; and costs of proper disposal and recycling.

Respondent shall use the SEP Offset Amount only for the direct cost of implementing the Project and no portion shall be spent on administrative costs. The SEP will be performed in accordance with all federal, state, and local environmental laws and regulations.

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Respondent's signature affixed to this Agreed Order certifies that it has no prior commitment to do this Project and that it is being done solely in an effort to settle this enforcement action.

B. Environmental Benefit

The SEP will provide a discernible environmental benefit by providing a means of properly disposing of HHW and other waste, which might otherwise be disposed of in storm drains, the sewerage system, or other means detrimental to the environment and help rid communities of the dangers and health threats associated with non-regulated dumping.

The recycling portion of the events will include recycling of household E-waste materials. E-waste materials may include computers and related information technologies such as workstations, scanners, printers, hand-held diagnostic and screening tools, cell phones, servers, and televisions, among many others. Cathode ray tubes ("CRT") are the picture tubes in computers, monitors and TVs. With the rapid evolution of technology, computers and TVs containing CRTs become obsolete in a short period of time and are simply discarded, often in landfills. A typical 17-inch CRT contains approximately two pounds of lead and larger CRTs may contain up to ten pounds of lead. E-waste and contain lead, mercury, cadmium, hexavalent chromium and brominated flame retardants.

The SEP will also limit potential toxic or hazardous e-waste from the waste stream destined for disposal or incineration and to divert the e-waste to recycling. This will save valuable landfill capacity and allow the recycler to re-utilize e-waste components, including CRTs.

C. Minimum Expenditure

Respondent shall spend at least the SEP Offset Amount to complete the Project described above and comply with all other provisions of this SEP.

2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, Respondent shall begin implementation of the SEP. Respondent shall have completed the SEP in its entirety within 365 days after the effective date of this Agreed Order.

3. Records and Reporting

A. Progress Report

Within 30 days after the effective date of this Agreed Order, Respondent shall submit a Notice of Commencement to the TCEQ describing actions taken to begin the Project. Within 90 days of the effective date of this Agreed Order, Respondent shall submit a report detailing the progress made on the Project during the previous 60-day period and setting forth a schedule for achieving completion of the Project within the time-frame required in Section 2. *Performance Schedule*, above. Thereafter, Respondent shall submit progress reports to the TCEQ in the following increments and containing detailed information as set forth in the Reporting Schedule table below:

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Table 1: Reporting Schedule

| Days from Effective Order Date | Information Required |
|---|--|
| 30 | Notice of Commencement describing actions taken to begin project |
| 90 | Actions taken during previous 60-day period to implement the project |
| 180 | Actions taken during previous 90-day period to implement the project |
| 270 | Actions taken during previous 90-day period to implement the project |
| 365 | Notice of SEP completion |

B. Final Report

Within 60 days after completion of SEP, and not later than 425 days after the effective date of the Agreed Order, Respondent shall submit a Final Report to the TCEQ, which includes:

- 1. A summary total of the amount of costs incurred;
- 2. An itemized list of expenditures and costs incurred;
- 3. Copies of invoices, paid receipts, checks, and other verifying documentation;
- 4. Copies of proof of advertisement of the collection event (the advertisement must include the statement that the SEP was performed as a result of a TCEQ enforcement action);
- 5. A certified/notarized statement of quantifiable environmental benefit;
- 6. Detailed map showing specific locations of the collection site(s);
- 7. Dated photographs of the Project showing the collected materials;
- 8. A count on the type of items collected, i.e. number of televisions, number of tires (by type, such as passenger, truck, etc.), number of appliances (by type), gallons of paint, etc.
- Manifest sufficient to show proof of proper disposal and/or recycling of the collected materials.
- 10. Any additional information Respondent believes will, or that is requested by TCEQ to demonstrate compliance with this Attachment A.

4. Additional Information and Access

Respondent shall provide additional information as required by TCEQ staff and shall allow access to all records related to the receipt and expenditure of the SEP Offset Amount. Respondent shall also allow representatives of the TCEQ access to the site of any work being financed in whole or in part by the SEP Offset Amount. This provision shall survive the termination of this Agreed Order.

5. Failure to Fully Perform

If Respondent does not perform its obligations under this Attachment A in any way, including full expenditure of the SEP Offset Amount and submittal of the required reporting described in Sections 2 and 3 above, the Executive Director ("ED") may require immediate payment of all or part of the SEP Offset Amount.

In the event the ED determines that Respondent failed to complete the Project, Respondent shall remit payment for all or a portion of the SEP Offset Amount, as determined by the ED, and shall include on the check the docket number of this Agreed Order and note that it is for reimbursement of a SEP. Respondent shall make the check payable to "Texas Commission on Environmental Quality" and shall mail it to:

Texas Commission on Environmental Quality Litigation Division Attention: SEP Coordinator, MC 175 PO Box 13087 Austin, Texas 78711-3087

6. Publicity

Any public statements concerning this SEP made by or on behalf of Respondent, must include a clear statement that the Project was performed as part of the settlement of an enforcement action brought by the TCEQ. Such statements include advertising, public relations, and press releases.

7. Clean Texas Program

Respondent shall not include this SEP in any application made to TCEQ under the "Clean Texas" (or any successor) program(s). Similarly, Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

8. Other SEPs by TCEO or Other Agencies

The SEP Offset Amount identified in this Agreed Order has not been, and shall not be, included as a SEP for Respondent under any other Agreed Order negotiated with the TCEQ or any other agency of the state or federal government.

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PAYABLE PENALTY

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PCW

Policy Revision 2 (September 2002) PCW Revision October 30, 2008

Respondent City of Wills Point
Case ID No. 40581

Reg. Ent. Reference No. RN101388973
Media [Statute] Water Quality

Enf. Coordinator Michaelle Sherlock

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

| and the second second second second | Number of | Enter Number Here | Adjust. |
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| | Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria) | 0 | 0% |
| | Other written NOVs | 4 7 4 | 8% |
| | Any agreed final enforcement orders containing a denial of liability (<i>number of</i> orders meeting criteria) | 1, 34, 1, 35, 4, 4, 5, 5, 5, 5, 5, 5, 5, 5, 5, 5, 5, 5, 5, | 20% |
| The second second | Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission | 0 | 0% |
| Judgments 2 | Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria) | | 0% |
| 基本主义的基础的 | Any adjudicated final court judgments and default judgments, or non- adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government | | 0% |
| Convictions | Any criminal convictions of this state or the federal government (number of counts) | 0 | 0% |
| : Emissions | Chronic excessive emissions events (number of events) | 25年,04年年 | 0% |
| Audits | Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature 1995 (number of audits for which notices were submitted) | | 0% |
| | Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed) | | 0% |
| Dental de Oktolik | | lease Enter Yes or No | |
| - 4 | Environmental management systems in place for one year or more | CARL NO. | 0% |
| Other | Voluntary on-site compliance assessments conducted by the executive director under a special assistance program | No | 0% |
| | Participation in a voluntary pollution reduction program | 入声(D) No (E) | 0% |
| 2.4 A 13 A | Early compliance with, or offer of a product that meets future state or federa government environmental requirements | No | 0% |
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| Screening Date | | Docket No., 2010-1721-MLM-E | PCW |
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| Enf. Coordinator | | | No. |
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| Rule Cite(s) | Mariato Alaba | Tex. Water Code § 26.121 | |
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| | water in the state. Sp | ecifically, at the time of the investigation, waste | from the |
| Violation Description | surface water treatme | ant plant lagoon containing wastewater from bac udge blow down, and various drains within the p | lant was |
| | observed exiting the I | agoon through an overflow pipe approximately | 1,800 feet |
| erenn | north of the ci | ty limits of Wills Point, and entering McBee Cree | |
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| servings. | daily | | and the state of t |
| EL CONTROL DE LA CONTROL DE | weekly | | |
| mark only on | e monthly x | Violation F | sase Penalty \$3,000 |
| with an x | | 20 12 2 | 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 |
| e frida | annual | | The state of the s |
| War and Arrival | Single events | | |
| -Three me | onthly eyents are recomm | ended) calculated from the first investigation da | te, July 21, |
| | 2010, to the | e screening date; October 15, 2010 | |
| [/ -0. 2. * L | | Programme and the state of the | |
| Good Faith Efforts to Co | | 0.0% Reduction e NOV NOV to EDPRP/Settlement Offer | \$0 |
| | | NOV NOV EL EDINIY SECTIONALION | , |
| | · I | | |
| L. CHERTINA | ' ' <u>———</u> | X (mark with x) | · |
| | Notes The Ro | espondent does not meet the good falth criteria this violation. | for |
| (Approximation) | | LIIS VIOLAUGIE | |
| | | Viola | tion Subtotal \$3,000 |
| | | | |
| Economic Benefit (EB) f | or this violation | Statutory Li | mic lest |
| Estin | nated EB Amount | \$19 Violation Final | Penalty Total \$3,840 |
| a Caracina | Th | nis violation Final Assessed Penalty (adjust | ed for limits) \$3,840 |
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| | Economic Ec | onomic l | Benefit ' | Wor | 'ksheet | | |
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| Respondent | | | AND RECORD AND ADDRESS OF THE SECOND STATE | 00029-11-008T-18- | | Fire a sermina a fair de la fire | .a |
| Case ID No. | s: ' | | • | | | | |
| Reg. Ent. Reference No. | | | | | | | |
| the second state of the second | Water Quality | | | | | valorini de departaçõe de c | Years of |
| Violation No. | 2 - 1 | | | | | Percent Interest | Depreciation |
| Violation no. | Maria de Caración | kija dio combinario protes | | | | | ing a substance of the |
| | | | | | | 5.0 | 15 |
| | Control of the second second | Date Required | Final Date | Yrs | Interest Saved | : Onetime Costs | EB Amount |
| Item Description | No commas or \$ | in arcognized | | | | | |
| | | | | | | | |
| Delayed Costs | ASIA HAZI STANDAN KATANIN | | de la Displace de la Company | one le la | | | |
| Equipment | SECTION AND SECTION OF THE SECTION O | alkalitasides establis | 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | 0.00 | <u> </u> | \$0 | 图4图4 \$0 * 图图4 |
| Bulldings | panispiana apatri, an | 我不是有我的HET-YEST CHARLE | A SO GREEN MENTING A SHE | 0.00 | \$0 | 2015 to \$015 to \$1 | 李州是02年十六年 |
| Other (as needed) | AND LOW WILLIAM STORY | 於的學科學學學學 | ti deptitalityks ingele | 0.00 | \$0 | pains some | ***** 50 *** |
| Engineering/construction | Assignment of the contract of | Philateographic party | TECHNOLIC METERS IN | 0.00 | ************************************** | 60 to 10 to | 3 **** * \$0 ****** |
| Land | ritigest and figure of the lights | 使生物类的现在分词 | TOWNS PARTICLES. | 0.00 | ************************************* | in/a* | = 1.4° \$ 0 ± − |
| Record Keeping System | - AND PROPERTY OF THE PROPERTY OF | · 1434年1月1日 - 1438年1月1日 | desprish while | 0.00 | \$0 | i i i nya≕ i i i | \$D - \$D |
| Training/Sampling | | 1995年 19 | spanistis aciditae | 0.00 | *) - * 50 * * * * * * * * * * * * * * * * * * | atu, laien/alliaises | >= 4 \$0 ₩ |
| Remediation/Disposal | Jacob Transport | anicament in the state of the | Spirite Hoods of the state of the | 0.00 | \$0 | -ara en/a≠ ara | #-### \$0 .4 \$2 / |
| Permit Costs | | and the Control (1984) | Commentation: | 0.00 | 7-17-80-0 - 1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1- | *°a=-4n/a = ±a | *** \$ 0 *** |
| Other (as needed) | \$500 | = 21-Jul-2010 | 1-May-2011 | 0.78 | \$19 | i a n/a a a a a a a a a a a a a a a a a a | \$19 |
| Notes for DELAYED costs | | ute controls to pr | event future un | author! | | ized discharge from alculated from the d bllance. | |
| Avoided Costs | ANNUAL | IZE [1] avoided | costs before | enterir | ng item (except | for one-time avoi | ded costs) 🤫 . |
| Disposal | | GORFACION NAMES OF | STREET, STREET | 0.00 | 111111111111111111111111111111111111111 | 14. 15. 15. 15. 15. 15. 15. 15. 15. 15. 15 | 我不够\$0半点型 |
| Personnei | A\$\$\$\$ - 37-35-644. | Py-MARKET L'INTERES | and sign and capable and | 0.00 | ************************************** | ************************************** | 学》的第二字 \$0 章 (***) |
| Inspection/Reporting/Sampling | ************************************** | Manager and Salating | SOMEON CONTRACTOR | 0.00 | ### # \$0 #### | 1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1- | - × \$0 - × - 1 |
| Supplies/equipment | majorini di di | in and exhibit appropriate in | Printed to the | lian in na | ### \$0 ****** | The area of Control of the Control o | 40 |
| | | | | 0.00 | | | \$0=0 |
| Financial Assurance [2] | \$100 per 150 per | elsolitations especial | 3 7.2. Bertherner | 0.00 | \$0 | \$0 *** | |
| ONE-TIME avoided costs [3] | | | | 0.00 | \$0 \$0 \$0 \$0 | \$0 | \$0.20 |
| | | | | 0.00 | ************************************** | \$0 - 4 1 | \$0 \$0 \$0 |
| ONE-TIME avoided costs [3] | | | Erskie Abstraß | 0.00 | \$0 \$0 \$0 \$0 | \$0 | \$0 \$0 \$0 \$0 |

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Penalty Calculation Worksheet (PCW) Policy Revision 2 (September 2002) PCW Revision October 30, 2008 DATES Assigned 27-Sep+2010 PCW 15-0ct-2010 Screening 15-Oct-2010 EPA Due RESPONDENT/FACTUTY INFORMATION Respondent City of Wills Point Reg. Ent. Ref. No. RN101388973 AND STREET STREET, STR Facility/Site Region 5-Tyler Major/Minor Source Majors CASE INFORMATION Enf./Case ID No. 40581 No. of Violations 17 Docket No. 2010-1721-MLM-E Order Type 1560 Media Program(s) Public Water Supply Government/Non-Profit Yes Multi-Media Water Quality Enf. Coordinator Michaelle Sherlock EC's Team Enforcement Team 2 Admin. Penalty \$ Limit Minimum Maximum \$1,000 Penalty Calculation Section \$7,950 TOTAL BASE PENALTY (Sum of violation base penalties) ADJUSTMENTS (+/-) TO SUBTOTAL 1 resident (b. Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage. 37.0% Enhancement Compliance History Subtotals 2, 3, & 7 \$2,941 Enhancement for three NOVs with same/similar violations; one NOV with dissimilar violations, and one agreed final enforcement order with denial. \$0 Culpability No 0.0% Enhancement Subtotal 4 ा े The Respondent does not meet the culpability criteria Notes Good Faith Effort to Comply Total Adjustments Subtotal 5 \$125 Economic Benefit 0.0% Enhancement* Subtotal 6 \$0 Total EB Amounts *Capped at the Total EB \$ Amount \$38,963 Approx. Cost of Compliance SUM OF SUBTOTALS 1-7 \$10,766 OTHER FACTORS AS JUSTICE MAY REQUIRE \$0 Adjustment. Reduces or enhances the Final Subtotal by the indicated percentage Notes

STATUTORY LIMIT ADJUSTMENT

不知此的一次的一致真的

Reduces the Final Assessed Penalty by the indicted percentage.

DEFERRAL CONTROL

Notes

PAYABLE PENALTY

Final Penalty Amount

Final Assessed Penalty

20.0%

(Enter number only; e.g. 20 for 20% reduction.)

Deferral offered for expedited settlement.

\$10,766

\$10,766

-\$2,153

\$8,613

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Screening Date 15-Oct-2010 Docket No. 2010-1721-MLM-E Respondent City of Wills Point

Policy Revision 2 (September 2002)
PCW Revision October 30, 2008

Law E Tille

Reg. Ent. Reference No. RN101388973

Case ID No. 40581

Media [Statute] Public Water Supply

Enf. Coordinator Michaelle Sherlock

Compliance History Worksheet

| | Compliance History Worksheet (v.Site Enhancement (Subtotal 2) | | e massayan danan ang basa sa | Captach Steps were |
|--|--|---|--|-----------------------|
| Component | | Enter Number Here | Adjust. | ibu v |
| American Company | Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria) | 3 | . 15% | E CETT STANDARDER PER |
| | Other written NOVs | unic Vermiliani I | . 2% | |
| | Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria) |) 1 | 20% | A |
| Orders | Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory—emergency—orders issued by the commission | | 0% | |
| Judgments, | Any_non-adjudicated_final_court_judgments_or_consent_decrees_containing_ a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria) | 0. | 0% | |
| Decrees | Any adjudicated final court judgments and default judgments, or non- adjudicated final court judgments or consent degrees without a denial of liability, of this state or the federal government | - 10 | 0% | |
| Convictions | Any criminal convictions of this state or the federal government (number of counts) | 0 | 0% | |
| Emissions | Chronic excessive emissions events (number of events) | 沙湾 (14-0) | 0% | |
| Audits | Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of-audits for which notices were submitted) | | . 0% | |
| | Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which</i> violations were disclosed) | .0 | 0% | |
| | | ease Enter Yes or No Is | 5 | 1 |
| . 753746.4 | Environmental management systems in place for one year or more | No. | 0% | |
| Que | Voluntary on-site compliance assessments conducted by the executive director under a special assistance program | No. | 0% 🕾 | |
| The state of the s | Participation in a voluntary pollution reduction program | - No. | 0% | |
| | Early compliance with, or offer of a product that meets future state or federal government environmental requirements | No. | 0% | |
| The same of the sa | Adjustment Pe | rcentage (Sub | ototal 2) | 37% |
| >> Repeat Violator (| Subtotal 3) | os vigalija vijet saktat at ili. Selata os taka sie ta z iona | | |
| NO | Angel | | | 0% |
| >>= Compliance Histo | ry Person Classification (Subtotal 7) | | | |
| Äverage Pe | | rcentage (Sul | ototal 7) | 0% |
| >> Compliance Histo | ny:Summary | | | |
| Compliance History Notes | Enhancement for three NOVs with same/similar violations, one NOV with dissimilations one with denials. | ar violations, and | e est conduction of the state o | ." |

Total Adjustment Percentage (Subtotals 2, 3, & 7)

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| Screening Date | | Docket No. 2010-1721-MLM-E | PCW |
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| Case ID No. | | | ry Revision 2 (September 2002) PCW Revision October 30, 2008 |
| Reg. Ent. Reference No. | | | and |
| Media [Statute] Enf. Coordinator | | | · |
| Violation Number | | | • |
| Rule Cite(s) | 300 | ex.:Admin::Code:§ 290.42(d)(2)(E) | |
| Violation Description | Specifically, an air gap filters and the waste was | p connection to waste on the filter-to-waste connections of the filter-to-waste connections of the provided due to insufficient grade between shwater lagoons resulting in significant head loss the filter wastewater drainage system. | the |
| | | Base Pe | enalty \$1,000 |
| >> Environmental, Proper | | th Matrix | |
| Release | Harm Major Moderat | e Minor | |
| OR Actual Potential | X | | THE COLUMN THE PROPERTY OF THE COLUMN THE PROPERTY OF THE COLUMN T |
| >>Programmatic Matrix | | | and an incident |
| Falsification | Major Moderat | | Property of the second |
| | nounts of contaminants wi | could result in customers of the Facility being expo lich would not exceed levels that are protective of h health. | |
| | | Adjustment | \$750 |
| | | | |
| | | | \$250 |
| Violation Events | | | Company of the Compan |
| Number of | Violation Events | Number of violation day | rs |
| mark only one with an x | dally. weekly. monthly. quarterly: semiannual. annual. single-event. | | enalty \$250 |
| One quatter | | rom the initial date of the investigation, July 21, 20 ning date, October 15, 2010. | 10, to |
| Good Faith Efforts to Con | iply | 0% Reduction | \$0 |
| | Before N Extraordinary Ordinary | OV NOV to EDPRP/Settlement Offer | · |
| | N/A × x: Notes The Resp | (mark with x) condent does not meet the good faith criteria for this violation. | |
| The section of the se | <u> </u> | Violation S | ubtotal \$250 |
| Economic Benefit (EB) fo | r this violation | Statutory Limit 1 | est |
| | | | |
| Estima | ted EB Amount | \$21 Violation Final Penalt | |
| | This | violation Final Assessed Penalty (adjusted for | limits) \$343 |

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| | E E | conomic | Benefit | Wot | ksheet | | Time to graduate to the |
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| Respondent | | | | | Maring Bill of the con- | the second second | |
| Case ID No. | 40581 | | | | | | |
| Reg. Ent. Reference No. | RN101388973 | | | | * | en de en | 2 7 |
| Media | Public Water 9 | Supply' | | | mass of the second | | Years of |
| Violation No. | 1 . | | | | - free | Percent Interest | Depreciation |
| | | | en verkendet en en Enverke beseit bestelde | | | 5.0 | .º 15 |
| | Item Cost | Date Required | Final Date | Yrs | Interest Saved | Onetime Costs | EB Amount |
| Item Description | | a de composit deservados de la decembra | | a activit | | | |
| ng 7 - Armanara kangsalaman labarah minin minin kalabab Mayarah saya palampanya pa | | ALERS AND THE STREET | | | | | Tanan (Special Special |
| Delayed Costs | | | | | | | |
| Equipment | National Control of | | | 0.00 | \$0 | \$0 | \$0 |
| Buildings | | Control of the second | 27,292X 5, 4154, 754 - 427 | 0.00 | \$0 | \$0 | \$0 |
| Other (as needed) | Statement of the Co | | 50 Per (2017) Per (2017) | 0.00 | \$0 | \$0 | \$0 |
| Engineering/construction | \$3100 | 11-Jun-2008 | 1-Jul-2011 | 3.05 | #354 363 \$1 276 366 | \$20 | \$21 |
| Land | 700 TO 100 T | | THE PROPERTY OF | 0.00 | \$0% | are region/a each | ¥ \$0 × * * |
| Record Keeping System | 医脑膜切除的 小小 | | 5741 2775 TH22 | -0.00 | \$0 | evertorn/a e | \$0 % 7 |
| Training/Sampling | 操稿基件 | e garage e karet | SMSTFC WAS INDICATED | 0.00 | \$\$0 | attackin/auto-educ | \$0 |
| Remediation/Disposal | 阿尔斯 斯里拉拉克。 | | SANGER OF THE TOP INVESTIGATION | 0.00 | 克尼亚 \$0 | . a marin/all a marin | \$0.00 |
| Permit Costs | | t es cur javaharo | | 0.00 | \$0 | a graduation/a | \$0 |
| Other (as needed) | | | an family education | 0.00 | \$0 | la successive n/a reason and | \$0 7 |
| Notes for DELAYED costs | from the dat | e of the investigat | tion when the v | olation | was first noted to | the waste-to-filter li the estimated date | of compliance. |
| Avoided Costs | ANNUAL | IZE [1] avoided | costs before | | | for one-time avoi | 4.00 |
| Disposal | The second second | | restantianes (Sec. | 0:00 | 9 3 3 30 3 5 5 | \$0 | \$0 |
| Personnel | AND COUNTY OF STATE | Control of the Contro | | 0.00 | \$0 | \$0 | \$0 |
| Inspection/Reporting/Sampling | 900 | | are an order of the second | 0.00 | | \$0 | \$0 |
| Supplies/equipment | 36H24UC | | Tarrey of the Park | 0.00 | | \$0 | \$0.0 |
| Financial Assurance [2] | \$500 FAB. (**) | | ACTES OF STREET | 0.00 | | 50 | 24.14.50 |
| ONE-TIME avoided costs [3] | MIGHT STREET, F | | C. Production of State of | 0.00 | \$0.00 | \$0 | - \$0 - \$0 |
| Other (as needed) | CARACTER STATE | | Administration and the second | ILOVOO | 15 | 3;::-:::::::::::::::::::::::::::::::::: | The state of the s |
| Notes for AVOIDED costs | | | | | | | |
| Approx. Cost of Compliance | | \$100 | 1 | | TOTAL | | \$21 |

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| Respon Case II Reg. Ent. Referenc Media [Sta | tute] Public Water Supply nator: Michaelle Sherlock umber 2 30.Te Falled to design the inlet a | x: Admin: Code § 290.4 nd outlet of clarification e destruction of floc. Sp | 2(d)(40)(B) facilities so as to prever ecifically, at the time of he larger clarifier were t | nt short; | PCW September 2002) October 30, 2006 |
|--|---|---|---|-------------|--|
| and to constitute the same | | | Base | Penalty | \$1,000 |
| >> Environmental, P | roperty and Human Health Harm | ı Matrix | | - | |
| OR | elease Major Moderate Actual X | Minor | Percent 50% | | energy with the property of th |
| >>Programmatic Ma | | | | | Abergeia Managa |
| The state of the s | ication Major Moderate | Minor . | Percent 0% | | d d canada canada |
| | lure to prévent short-circulting coul mars of the Facility to a significant are prof | amount of contaminants | | velsithat | man es sammadir Affe |
| | | | Adjustment | \$500 | do harden and an annual and an annual and an annual an a |
| Transferrational transferration and the second seco | | | | | \$500 |
| Violation Events | | | | | alan bi radan bi bi da bi |
| Nun | nber of Violation Events | 86 | Number of violation | days . | is je mana managa |
| | monthly x an x semiannual single events | | Viojation Bas | e Penalty | \$1,500 |
| Ţĥreė | monthly events are recommended the screen | from the initial date of t ng date; October 15, 20 | | , 2010, to | The state of the s |
| Good Eaith Efforts to | Before NOV Extraordinary Ordinary N/A | / NOV to EDPRP/Settlement | e good faith criteria for | | \$0 |
| BE-PRICE. | | | Violation | n Subtotal | \$1,500 |
| Economic Benefit (E | B) for this violation | | Statutory Limi | | |
| | Estimated EB Amount | \$662 | Violation Final Pen | | \$2,055 |
| | This | /iolation Final Assess | ed Penalty (adjusted | for limits) | \$2,055 |

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Economic Benefit Worksheet Respondent City of Wills Point A PERSONAL PROPERTY. 新力! Sib. Case ID No. 40581 Reg. Ent. Reference No. RN101388973 N State Section Media Public Water Supply Years of Percent Interest Violation No. 2 Item Cost Date Required Final Date Yrs: Interest Saved: Onetime Costs Item Description, No commas or \$-Delayed Costs Equipment 0.00 Buildings -0.00 \$0 \$0 Other (as needed) 0:00 \$0 \$630 Engineering/construction 0.95 \$32 \$662 Land 0.00 \$0: r•n/a⊭ \$0 Record Keeping System Training/Sampling 0.00 **ፍ**ብ n/act \$0 0:00 \$0 \$0 Remediation/Disposal ₃0,00 \$0. Permit Costs Other (as needed) Delayed costs include the estimated amount to design the facilities to prevent short-circuiting of flow or Notes for DELAYED costs the destruction of floc, calculated from the investigation date to the estimated date of compliance. Avoided Costs ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs) Disposal -0.00 ×\$0 * Personnel -0.00 \$0 \$0 \$0 Inspection/Reporting/Sampling 0.00 Supplies/equipment 0.00 \$0: Financial Assurance [2] 0.00 \$0 \$0. \$0 ONE-TIME avoided costs [3] 0.00 Other (as needed) Notes for AVOIDED costs Approx. Cost of Compliance \$10,000 TOTAL \$662

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| Scree | ning Date | 15-Oct-2010 | Dog | ket No. 2010-1721-N | ИLM-Е | PCW |
|--|--|--|--|--|--|--|
| | | City of Wills Point | | | | vision 2 (September 2002) |
| Ca Reg. Ent. Refe | se ID No. | | | | PCW | Revision October 30, 2008 |
| | | Public Water Supply | | | | |
| | | Michaelle Sherlock | | | | accell (Alor |
| | ion Number | 5 | | | ···· | |
| . 1 | Rule Cite(s) | | 0 Tex. Admin. Code § | ; 290,42(d)(11)(F)(iii) | | 0.00 0.00 0.00 0.00 |
| | | Falled to provide a r | ate of flow of backwas | sh water that is at least : | 20 Inches vertic | al |
| Violatión « | Description | more than 35 inc Specifically, at the | thes of vertical rise po time of the investigat | ("gpm") per square foot er minute (21.8 gpm per lon, it was documented 10.4 gpm per square foo ency | square foot) that the Facility | 96 |
| | | | | | Base Pena | \$1,000 |
| >> Environment | tal, Propei | | | | | Service Laboratory |
| | Release | | arm Jerate Minor | | | |
| OR | Actual | Territoria de la companya del companya de la companya del companya de la companya | 2.11.22 | B4-1 | | |
| The second secon | Potential | | X COLUMB TO SERVICE | Percent | 25% | to Longitude |
| >>Programmati | c Matrix | | | | | |
| | Falsification | Major Mod | derate Minor | | | |
| | H THE WARREN | | 海球科 | Percent | 0% | t Parties |
| Street and the street | The special section of the section o | e magasia kepingganan | nika opurne nodena kirka je je je je | ing 1868 by a company of the company | outeus anită :- ··················· | |
| | | | | revent proper cleaning of ould expose customers. | | |
| Notes | | | | ceed levels that are prot | | |
| T-Line | * /// | | tit in thealth: | ereng breeze () i | | |
| The state of the s | | | | | <u> </u> | ١ |
| | | and the second | | Adjustment | \$7 | '50 |
| | | | | | | \$250 |
| | | | | | | |
| Violation Events | | | | | | Marine de |
| | Number of | Violation Events | 48.6-33 | 86 Number of | violation days | No. |
| | | | | | | A Projection of the Control of the C |
| | | dally weekly | | | • | a de la companya de l |
| * | | # monthly | | | | |
| H | mark only one with an x | quarterly | X 4 | Violat | tion Base Pena | ilty \$250 |
| | | semiannual | 6.267034 | | | |
| APPENDING TO A | | annual | | • | | |
| - | | | a cat contrast of | | | o n and the |
| 100 mm | One quarterly | vevent is recommend | ed from the initial dat | e of the investigation, it | ıly 21, 2010, to | the |
| 100 | | | eening date, October | | | |
| <u>L</u> | | , and the same of | | 1 | and the comment of the control of th | |
| Good Faith Effo | rts to Con | | 0.0% Reduction | | The second secon | \$ 0 |
| | | Bef Extraordinary | ore NOV NOV to EDPRP/ | Settlement Offer | | |
| | | Ordinary | | | | |
| | | N/A | X (mark with x) | | | |
| | | The | Respondent does not | meet the good faith crit | teria for | |
| | | Notes | | Violation. | | 4 |
| | | - , | | • | Violation Subt | otal \$250 |
| Economic Bene | fit (EB) fo | r this violation | | Statutor | y Limit Tesi | |
| | | | | | | |
| | Estima | ted EB Amount | \$33 |] Violation F | inal Penalty T | otal \$343 |
| | THE UNIVERSITY AND ADDRESS. | PARAMETER AND THE PROPERTY OF | This violation Final | Assessed Penalty (ac | djusted for lim | its) \$343 |
| | 2 Aug 194 197 197 197 197 197 197 197 197 197 197 | | | | | Carrier St. Service College Property |

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| | i se productiva E | conomi c i | senerit. | vvori | (sneet | | |
|--|--|--|--|--------------------|--|--|--------------------------------|
| Respondent | City of Wills Po | oint | and the second s | | | Contract Contract Contract | |
| Case ID No. | 40581 | | | | | TX told in | |
| Reg. Ent. Reference No. | RN101388973 | | | | . 9. | s in Midwell services | 5. 13° |
| | Public Water S | | | ,,:· | it in the second | | Years of |
| Violation No. | | (, , | | | | Percent Interest | Depreciation |
| | toge to the second | | | | e igragi versiya i badasak Esti ili ili ili ili ili ili ili ili ili i | 5.0 | : 1 |
| The state of the s | Trom Coef- | Date Pennired | Einal Date | Vre T | nterest Saved | | EB Amount |
| | | The second secon | | | China and a significant | a marka a a programa de Cara | normalis in the legitime and |
| Item Description | No commas or s | | Surah Maria | | | | |
| | | Market Street Company of Company of Company | | k erstet Karana | | | |
| Delayed Costs | | | | 10.001 | \$0 | l \$0 | \$0 * |
| Equipment Buildings | | | | 0.00 | \$0 **\$0 | \$0 | \$0 |
| Other (as needed) | 38994 - 132 - 1 | | The State of the S | 0.00 | \$0 | \$0 | * * \$0 |
| Engineering/construction | \$500 | | * 1-Jul-2011 | 0.95 | \$2 | \$32 | \$33 |
| Land | | | | 0.00 | ******** | Selector/are selection | \$0 |
| Record Keeping System | STATES STATES SEED. | e e e e e e e e e e e e e e e e e e e | yas de los content | 0.00 | \$0 | ese si nya mara | \$0 |
| Training/Sampling | "是我们的 " | i engger | \$460 SEC. 5500,00550 | 0.00 | \$0. | # pre n/a ∈ lu | \$0 |
| Remediation/Disposal | spanished to the second | C CATTLE CALL AND A CALL CALL CALL CALL CALL CALL CALL C | endale elektri | 0.00 | \$0 <u>.</u> | in a company and a company | \$0 <u>:</u> |
| Permit Costs | 學 2000年 | | Commence of the | 0.00 | \$0.∌ ==== | Presidenta di Cale | \$0 |
| Other (as needed) | 建黎 (2012年,617年3年 | e andres de region de la compa | Bar descriptions | 0.00 | \$0 | a market n/a | \$0 |
| Notes for DELAYED costs | gerrorienienienienienienienienienienienienieni | calculated from | the investigation | on date t | o the estimated | e rate of flow of bac date of compliance. | e za nasta Grania di Grania |
| Avoided Costs | | IZE [1] avoided | costs before | | | for one-time avoi | |
| Disposal | | | STREET, | 0.00 | \$0 | \$0 \$0 | \$0 |
| Personnel | SDARGUES COM. OF | Control of the second s | | 0.00 | \$0 \$0 | \$0 \$0 | \$0 \$0 |
| nspection/Reporting/Sampling | 30 BB 122 | | | 10.00 | \$0 | \$0 | 50 |
| Supplies/equipment Financial Assurance [2] | School and the | | | 0.00 | ÷ \$0 | \$D | \$0 |
| ONE-TIME avoided costs [3] | | The second second second | | 0.00 | \$0 | \$0 | \$0 |
| Other (as needed) | Autorities in the | | | 0.00 | - so - | \$0 | \$0 |
| Notes for AVOIDED costs | Control Value | | Tributan 2 | | | | |
| Approx. Cost of Compliance | | \$500 | | ALICX | TOTA | | \$3 |

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| Screening Date | 15-Oct-2010 City of Wills Point | Docket N | 0. 2010-1721-MLM-E | PCW |
|--|---|--|---|--|
| Case ID No. | 40581 | | | Policý Revision 2 (September 2002) PCW Revision October 30, 2008 |
| Reg. Ent. Reference No. Media [Statute] | | | ٠ | |
| Enf. Coordinator | Michaelle Sheriock | • | | |
| Violation Number Rule Cite(s) | | Admin. Code § 290.42(c | Wegazeva veta | |
| • | | , Autilia . Code 9 . 2 90 . 42 (t | 1VT 1M - WiA WITA | |
| Violation Description | the investigation, it wa | | h cycle. Specifically, at t packwash on gravity filte | he time of r No. 1:44 |
| | • | | Bas | e Penalty \$1,000 |
| >> Environmental, Proper | ty and Human Heal Harm | th Matrix | | |
| Release Actual | Major Moderat | e Minor | | |
| OR Actual Potential | 333.1.121.331.033 | | Percent 25% | |
| >>Programmatic Matrix | | | ACCOMPANY AND THE STATE OF THE | |
| Falsification | Major Moderat | | Percent 0% | • |
| | | 5i. 7. | 1 | perior/action conventing that |
| couldrexpose. | ovide an adequate flow of b customers of the Facility to | a significant amount of | pollutants which would r | not exceed |
| Notes | /levels-that a | re protective of humansh | iealth: | |
| The second secon | | | Adjustment | \$750 |
| | - | | | \$250 |
| Violation Events | | | | |
| Number of | Violation Events | iii | Number of violation | days |
| | daily | · · · · · · · · · · · · · · · · · · · | | |
| | weekly | 1650 1500 | | |
| mark only one with an x | monthly quarterly x | | Violation Bas | se Penalty \$25 |
| | semiannual annual | | | |
| | single event | | | |
| One giuarterly | event is recommended fro | om the initial date of the | lovestigation, July 21, 2 | 010: to the |
| | | ng date, October 15, 201 | | |
| Good Faith Efforts to Com | iply 2000 | 0% Reduction ==== | | |
| | Before No Extraordinary | OV NOV to EDPRP/Settlemen | it Offer | And the second s |
| | Ordinary | And the state of t | | |
| | N/A | ya yezatika iyara c | | The state of the s |
| | Notes The Res | oondent does not meet th this violatio | | |
| | | | Violatio | n Subtotal \$25 |
| Economic Benefit (EB) fo | rthis violation | | Statutory Lim | itTest |
| Estima | ted EB Amount | \$34,214 | Violation Final Pe | nalty Total \$34 |
| | This | violation Final Assess | ed Penalty (adjusted | for limits) \$34 |
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Economic Benefit Worksheet Respondent City of Wills Point Case ID No. 40581 Reg. Ent. Reference No. RN101388973 Years of Media Public Water Supply Percent Interest Depreciation Vigeta is Violation No. 4 De arabon 5.0 ₩ 15 Item Cost | Date Required | Final Date | Yrs Interest Saved Onetime Costs EB Amount Item Description No commas or \$ Delayed Costs Equipment Buildings 0.00 Other (as needed) ≟0.00 \$0 Engineering/construction 1-Jul-2011 3.05 \$1,629 Land 0.00 Record Keeping System 0.00 ∌en/a-ree ີ \$በ Training/Sampling 0.00 \$D. Remediation/Disposal 0.00 \$0 Permit Costs 0.00 -\$0多特殊 Other (as needed) 0.00 belayed costs include the estimated amount to remove and replace the existing filter backwash facilities. and construct an air scour facility, calculated from the date of the investigation when this violation was: Notes for DELAYED costs first noted to the estimated date of compliance. ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs) Avoided Costs 0.00 Disposal \$0.000 0.00 Personnel - \$0 Inspection/Reporting/Sampling 0.00 Supplies/equipment -0.00 Financial Assurance [2] 0.00 ONE-TIME avoided costs [3] 0.00 Other (as needed) Notes for AVOIDED costs

18.00

\$160,000

Approx. Cost of Compliance

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| Screening Date Respondent Case ID No. Reg. Ent. Reference No. | City of Wills Point 40581 | Docket N | 0 2010-1721-MLM-E | Policy Revision | PCW 2 (September 2002) ion October 30, 2008 |
|--|---|---|---|----------------------------|--|
| Media [Statute] Enf. Coordinator Violation Number Rule Cite(s) | Public Water Supply Michaelle Sherlock | | | | |
| Violation Description | Falled to identify the infi the use of labels or investigation, it was of | UTex. Admin. Code 5 290 uent, effluent, waste bac various colors of paint; S served that the settled v | kwash, and chemical for pecifically, at the time vater lines feeding both | of the 🚧 s n clarifiers | |
| | were not properly color | coded or labeled, and m lines were not labe | led | ase Penalty | \$1,000 |
| >> Environmental, Proper | ty and Human Hea | lth Matrix | | | |
| Release OR Actual Potential | Harm Major Modera | 1 <u>.</u> | Percent 0 | % | |
| >>Programmatic Matrix | | | | | |
| Falsification | Major Modera | | Percent 10 | % | As an are probled |
| Matrix Notes | Between 30% and | 70% of the rule requirer | nent was met. | A Partie A | |
| | | | Adjustment | \$900 | |
| · · | , | , | | | \$100 |
| Violation Events | | | | | And the second s |
| Number of | Violation Events | 86 | Number of violati | ion days. | · · |
| mark only one with an x | daily weekly monthly quarterly semiannual annual single-event x | | Violation E | Base Penalty[| \$100 |
| | | ngle event is recommend | ed. | | na operati Prisassimi minima Prisassimi in P |
| Good Faith Efforts to Com | | .0% Reduction | | | \$0 |
| | Extraordinary Ordinary N/A | | ent Offer | | |
| | Notes The Re | spondent does not meet this violati | | for | |
| | • | | Viola | tion Subtotal | \$100 |
| Economic Benefit (EB) fo | this violation | | Statutory E | mit Test | |
| Estima | ted EB Amount | \$33 | Violation Final | Penalty Total | \$137 |
| | Th | is violation Final Asses | ssed Penalty (adjust | ed for limits) | \$137 |

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Economic Benefit Worksheet Respondent City of Wills Point Case ID No. 40581 Reg. Ent. Reference No. RN101388973 Media Public Water Supply Percent Interest Violation No. 5 Item Cost Date Required Final Date Yrs Interest Saved Onetime Costs Delayed Costs Equipment 0.00 \$0 Buildings 0.00 \$0 0.95 1-101-2011 Other (as needed) Engineering/construction **ሩ**በ \$0 50 Land 0.00 \$0 n/a SD. Record Keeping System Training/Sampling 0.00 \$0 sn/a 40 0.00 50 Remediation/Disposal 0.00 \$0÷ 50 Permit Costs 0:00 Other (as needed) 0.00 Delayed costs include the estimated amount to properly label or paint the lines; calculated from the initial Notes for DELAYED costs date of the investigation to the estimated date of compliance. ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs) Avoided Costs **\$**0. 0.00 Personnel 0.00 Inspection/Reporting/Sampling 0.00 0.00 \$0 \$0 Supplies/equipment **\$**0-Financial Assurance [2] O.D0 \$0 50 ONE-TIME avoided costs [3] 0.00 Other (as needed) | 0.00 |∍ Notes for AVOIDED costs

\$500

Approx. Cost of Compliance

TOTAL

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| Respondent | 15-Oct-2010 | Docket No. 2010-1721-MLM-E | ₽CW |
|--|--|--|--|
| | City of Wills Point | | Policy Revision 2 (September 2002) |
| Case ID No. | | • | PCW Revision October 30, 2008 |
| Reg. Ent. Reference No. | | | |
| Media [Statute] | | | - |
| Enf. Coordinator Violation Number | | | - |
| Rule Cite(s) | | | |
| , | | ex. Admin. Code 5 290.42(f)(1)(C) *********************************** | |
| | Historian des Bible a tra l'accept de la companya del companya de la companya de la companya del companya de la companya del la companya de l | | Provide the control of the control o |
| To the state of th | | on all chemical bulk storage facilities and day | |
| Violation Description | | emical remaining in the facility or tank. Specific was observed that the 50% caustic bulk stora | |
| | | not have a level indicator. | |
| To a second seco | is on all out to the displaced | | |
| | • | | |
| THE STATE OF THE S | | Ва | se Penalty \$1,000 |
| >> Environmental, Proper | ty and Human Health | i Matrix | |
| The state of the s | Harm | | |
| Release Actual | | | |
| OR Actual Potentia | | Percent 10% | 1 |
| Occidan | A SPACE STREET, STREET | Figure 10 V | |
| >>Programmatic Matrix | | | |
| Falsification | Major Moderate | | |
| | | Percent 0% | |
| | | | A 50 A2 A 50 A 50 A 50 A 50 A 50 A 50 A |
| | The Party of the Control of the Cont | mical bulk storage and day tanks could expose | \$41 |
| Matrix to an instini | ficant amount of contaminan | nts from improperly treated water that would r | |
| Notes | levels pro | oteetive of human health. | |
| | | 202 (EL 2010) (E. 100) (E2-0) (E. 10) | Wenning to the second |
| | | Adjustment | \$900 |
| | | Aujustus | 42001 |
| | | | \$100 |
| | | , | |
| Violation Engate | | | And Annual Control of the Control of |
| Violation Events | | | |
| American control of the control of t | Violation Events | Number of violatio | n days |
| American control of the control of t | Violation Events | Number of violatio | n days |
| American control of the control of t | daily | | n days |
| American control of the control of t | dally weekly | | n days |
| Number of mark only one | daily weekly monthly | | |
| Number of | weekly monthly— | | |
| Number of mark only one | daily weekly monthly | Violation Ba | |
| Number of mark only one | weekly weekly monthly guarterly semiannual | Violation Ba | |
| Number of mark only one | weekly weekly monthly guarterly semiannual | Violation Ba | |
| Number of mark only one | daily weekly monthly guartetly semiannual annual single event x | Violation Ba | |
| Number of mark only one | daily weekly monthly guartetly semiannual annual single event x | Violation Ba | |
| Number of mark only one | daily weekly monthly guartetly semiannual annual single event x | Violation Ba | se Penalty \$100 |
| Number of mark only one | dally weekly s monthly quarterly, semiannual single event x One singl | Violation Ballie event is recommended: | |
| Number of mark only one with an x | dally weekly a monthly quarterly, semiannual annual single exent x One singl | Violation Balle event is recommended: 90 Reduction V NOV to EDPRP/Settlement Offer | se Penalty \$100 |
| Number of mark only one with an x | dally weekly s monthly quarterly semannual sannual single exent One singl exerce of the single stream of the sing | Violation Balle event is recommended: 90 Reduction V NOV to EDPRP/Settlement Offer | se Penalty \$100 |
| Number of mark only one with an x | daily weekly monthly guartetly semiannual annual single event One single Extraordinary Ordinary | Violation Balle event is recommended: Reduction Violation V | se Penalty \$100 |
| Number of mark only one with an x | daily weekly monthly guarterly semiannual annual single event One single Extraordinary Ordinary N/A X | Violation Backer Violation Backer Violation Backer Violation Backer Violation Backer Violation V | se Penalty \$100 |
| Number of mark only one with an x | daily weekly a monthly guartetly semiannual annual single event x One single Extraordinary Ordinary N/A The Respon | Violation Baselie event is recommended: 96 Reduction V NOV to EDPRP/Settlement Offer (mark with x) Condent does not meet the good faith criteria for | se Penalty \$100 |
| Number of mark only one with an x | daily weekly monthly guarterly semiannual annual single event One single Extraordinary Ordinary N/A X | Violation Backer Violation Backer Violation Backer Violation Backer Violation Backer Violation V | se Penalty \$100 |
| Number of mark only one with an x | daily weekly a monthly guartetly semiannual annual single event x One single Extraordinary Ordinary N/A The Respon | Violation Ballie event is recommended: 90 Reduction V NOV to EDPRP/Settlement Offer (mark with x) ondent does not meet the good faith criteria for this violation. | se Penalty \$100 |
| Number of mark only one with an x | daily weekly a monthly guartetly semiannual annual single event x One single Extraordinary Ordinary N/A The Respon | Violation Ballie event is recommended: 90 Reduction V NOV to EDPRP/Settlement Offer (mark with x) ondent does not meet the good faith criteria for this violation. | se Penalty \$100 |
| Mumber of mark only one with an x Good Faith Efforts to Con | daily weekly monthly guarterly somianical annual single event Cone single Particulary One single One single A cone Before NOV Extraordinary Ordinary N/A Notes The Response | Violation Base event is recommended: 9/6 Reduction V NOV to EDPRP/Settlement Offer (mark with x) ondent does not meet the good faith criteria for this Violation. | se Penalty \$100 \$100 \$0 \$0 \$100 |
| Mumber of mark only one with an x Good Faith Efforts to Con Economic Benefit (EB) fo | monthly guarterly: semiannual sannual single event Cone single event Notes The Respo | Violation Baselie eyent is recommended: We Reduction V NOV to EDPRP/Settlement Offer (mark with x) ondent does not meet the good faith criteria for this violation. Violation | se Penalty \$100 \$100 \$0 Subtotal \$100 |
| Mumber of mark only one with an x Good Faith Efforts to Con Economic Benefit (EB) fo | daily weekly monthly guarterly somianical annual single event Cone single Particulary One single One single A cone Before NOV Extraordinary Ordinary N/A Notes The Response | Violation Base event is recommended: 9/6 Reduction V NOV to EDPRP/Settlement Offer (mark with x) ondent does not meet the good faith criteria for this Violation. | se Penalty \$100 \$100 \$0 Subtotal \$100 |
| Mumber of mark only one with an x Good Faith Efforts to Con Economic Benefit (EB) fo | monthly guarterly semiannual single-event *One single * | Violation Baselie eyent is recommended: We Reduction V NOV to EDPRP/Settlement Offer (mark with x) ondent does not meet the good faith criteria for this violation. Violation | se Penalty \$100 \$100 \$100 \$100 \$100 \$11t Test enalty Total \$137 |

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| | Ec | onomic | Benefit | Wor | ksheet | | |
|--|--|---|--------------------------------------|---------------------|--|--|--|
| Respondent | | | AND COMMON PROPERTY. | · · | | THE WAS LESS OF THE | Principle and Automorphism control of the College o |
| Case ID No. | | • | | | 15541 | 4J. (21. 06; . | |
| Reg. Ent. Reference No. | | | | | | i i oh samveta | Section 200 |
| | Public Water Su | nnlv . | | | age in ego, to remin | et konstanti sitaman fizika | Years of |
| Violation No. | | PP') | • | • | 3.7 | Percent Interest | Depreciation |
| VIGIATION AND | | | | | | | |
| CHARLES CONTRACTOR | en un aparto de av | a september berigg | | | | 110 march # 1/ 5.0 | |
| CONTRACTOR STATES OF THE STATE | Trille season, Trilled William | Date Required | Final Date | Yrs I | Interest Saved | Onetime Costs | EB Amount |
| 🚈 🚐 Item Description | No commas or \$ | elekara ikuliya | | | | | nte loudiative et i |
| | | 18 TS | <u> </u> | | <u> </u> | | |
| Delayed Costs | | | | estation in | | | |
| Egyjpment" | | Spania i i de debesto (2). | | 0.00 | ÷÷÷ \$0 ≈ *** | ÷÷÷÷÷50 | so°: |
| Buildings | 《大学》(1986) | agi (1991) (1991) ang paga shari | | 0.00 | \$0 | \$0 | \$0 |
| Other (as needed) | | Contractivity of the same | de transcription y and | 0.00 | \$0 | 37 0 150 150 150 150 | 20140 |
| Engineering/construction | 學表表 \$200%等一 | 21-3ul-2010 | -1-Jul-2011 | 0.95 | \$1 | \$13 | \$13 |
| Land | PARTICULAR CO. | | e recessé reces | 0.00 | \$0 | ####T/8 | \$D |
| Record Keeping System | Constitution and the | and interest with the factors | ti shaqaan Shrift | 0.00 | so | an and n/articles | \$0 |
| Training/Sampling | 200000 | | | 0.00 | \$0 | S ∩/à | \$0 |
| Remediation/Disposal | | | Mary Port Const | 0.00 | \$0 | n/a | \$0 |
| Permit Costs | | | | 0.00 | \$0 | nya . | ≥ 3, \$ 0 |
| Other (as needed) | | | A Property and | 10.00 | \$ \$0 PP \$ | carranta de la carra | \$0 |
| Notes for DELAYED costs | storage tank | , calculated from | n the initial dat | e of the li | nvestigation to th | dicator for the 50% in electronic for one-time avoi | f compliance: |
| Avoided Costs | ANNOALL | ze [1] avoided | COSIS DEIDLE | | | | |
| Disposal Personnel | SEAL SELECTION CONTROL SELECTI | erferedur Solómere el care. Telefalos el calendare | THE RESIDENCE OF THE PROPERTY OF THE | 0.00 | - 30 ± 50 ± 5 ± 5 ± 5 ± 5 ± 5 ± 5 ± 5 ± 5 ± | ±\$0 \$0 | \$0 \$0 |
| nspection/Reporting/Sampling | acultif asion ' | | | 0.00 | \$0 | \$0 | \$0 |
| Supplies/equipment | | | | 0.00 | \$0 | \$0 | \$0 |
| Financial Assurance [2] | 300000 | operation of the second second | | 0.00 | \$0 | \$0 | \$0 |
| ONE-TIME avoided costs [3] | TORSE TO STATE OF THE STATE OF | THE SHARESTAN | 4.000.4.00.40.00.00.00.00.00 | 0.00 | \$0.7 | \$0 | \$0 |
| Other (as needed) | 8 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 | tighte of Law against | 255 as Card a 101, c. ser. ce () | 0.00 | \$0 | \$0 | \$0. |
| (| AND THE STATE OF THE | en soleto, subsessiven | iyari x xaalabaan | EXTERNAL CONTRACTOR | g ve Tes y a ve lle te suge | ng in 1812 in Ka ndang an kata | 250100 - 0.000 ft/3.000 |
| | W ENT OF SERVICE | and the east broom | grounding skild. | | | | |
| Notes for AVOIDED costs | | ngyaki sarakiy binki i | | The Control | | un yan in dan kinda | |
| i de g | 12 Tr 0457 (2011) 100 VeV 120 100 CT 120 CT | giski tirkik | | | acialia di Califolia | | CELECTER POSES |
| 7 1 had 1 m | Section and provider | Marking Property | | rajjer gjar knikkij | e angle de group () de la constant | | kometikele 164 dê ke |
| | | | , | 12. | and the contract of the contra | | |
| Approx. Cost of Compliance | } | \$200 | | 33 | TOTAL | | \$13 |

: 25%

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| Screening Date | 15-Oct-2010 City of Wills Point | Docke | t No. 2010-1721-MLM-E | ak welalin da | PEW |
|--|--|---|--|---|--|
| Case ID No. | | | | | (September 2002) October 30, 2008 |
| Reg. Ent. Reference No. | | | | | - CANADA |
| Media [Statute] Enf. Coordinator | | | | | |
| Violation Number | | | | | |
| Rule Cite(s) | 30 | Tex: Admin: Code 5 2 | 90.42(f)(1)(E)(II) | a, property | |
| | | | | the same of the same of | |
| Violation Description | tanks: Specifically, at t | he time of the hyesti | llities for all liquid chemical gation, it was observed that fate ('EAS') day tank did no nt structure | the bulk | |
| | | | Bas | e Penalty | \$1,000 |
| >> Environmental, Proper | ty and Human Hea | Ith Matrix | | | |
| Release | Harn Major Modera | | | | |
| End you had not been a second to | | | *** | • | *************************************** |
| Potential | | | Percent 10% | , | |
| >>Programmatic Matrix | | | | | į |
| Falsification | Major Moder | ate Minor | Percent 0% | } | r reputer i |
| Stand Standard Scholard Schola | hamman dearmost racros from transferative | AND THE PERSON OF THE PERSON | Percent 0% | | Part A Laboratory |
| Matrix employees | or the environment to an | insignificant amount (| chemical storage tanks cou of chemicals which would no environmental receptors. | | a construence as in fraction (see construence) |
| The sample of th | | | Adjustment | \$900 | 111144 |
| The second secon | Same and the state of the state | a managati kitiya milita da milika da milika da kanana milita milita milita da milita da milita da milita da m Milita milita da mili | as the courses to the state of the state of the course of | | \$100 |
| A SECRETARIAN SING PROOF SECRETARIAN SING PROOF SECRETARIAN SINGS AND | | | The Control of the Co | | \$100 |
| Violation Events | | | | The state of the state of | |
| | (K. 180 m 2 0 | 6/12 | 86% Number of violation | ı days | rppidati |
| mark only one with an x | daily weekly monthly quarterly semiannual | | Violation Ba | se Penalty | ÷200 |
| | single event x | 600-000 | | | |
| | • | | | (1984-1987) | elevine tracks |
| Two sin | Extra section of the first of the | ided, one for each tan | k without secondary contain | ment. | nautralitiki |
| Good Faith Efforts to Com | nply control | 0.0% Reduction | | | \$0 |
| | Before Extraordinary | 22 7 1 22 22 2 2 2 2 2 2 2 2 2 2 2 2 2 2 | lement Offer | | of the state of th |
| | Ordinary | | 9-20 Mar. A 9 | | gungan is one |
| | N/A | (mark with x) | | | |
| | Notes The Re | spondent does not me this vio | et the good faith criteria foi lation. | | |
| - | | | Violatio | n Subtotal | \$200 |
| Economic Benefit (EB) fo | r this violation | | Statutory Lim | it Test | |
| | ited EB Amount | \$2,234] | Violation Final Pe | | \$274 |
| | | ,, | | | |
| | Th | us violation Final As | sessed Penalty (adjusted | i for ilmits) | \$274 |

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Economic Benefit Worksheet Respondent City of Wills Point 17(6st/77 Gase ED No. 40581 Reg. Ent: Reference No. RN101388973 The THEFT. BL. rak of Karra Berling Years of Media Public Water Supply Violation No. 7 15 Ttem Cost: Date Required : Final Date :: Yrs : Interest Saved :: Onetime Costs :: EB Amount ! Item Description No commas or \$ Delayed Costs Equipment 0.00 Buildings % \$0 - ∞ F 0.00 - \$0 1-Aug-2011 1-Aug-2011 -21-Jul-2010 -11-Jun-2008 Other (as needed) 1.03 \$2 \$34 ' ሩ ንና Engineering/construction 3.14 \$105 \$2,093 \$2,198 0..00 Record Keeping System 0.00 Training/Sampling 0:D0 \$0 Remediation/Disposal 0.00 \$0 \$0 Permit Costs 0.00 \$0 Other (as needed) 0:00 - \$0 The engineering/construction-delayed cost is the estimated amount to provide secondary containment facilities for the alum tank, calculated from the date of the investigation when the violation was first observed to the estimated date of compliance. The other delayed costs include the amount to provide Notes for DELAYED costs secondary containment facilities for the LAS day tank, calculated from the investigation date to the estimated date of compliance. ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs) Avoided Costs Disposal 0.00 Personnei -0.00 Inspection/Reporting/Sampling 0.00 \$0 \$0 Supplies/equipment 50 0.00 \$0 Financial Assurance [2] 0.00 \$0 \$0 \$0 ONE-TIME avoided costs [3] 0.00 \$0 \$0 Other (as needed) Notes for AVOIDED costs TOTAL \$10,500 Approx. Cost of Compliance \$2,234

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| Screening Date | | Docket No. 2 | 010-1721-MLM-E | PCW |
|--|--|--|---------------------------|--|
| | City of Wills Point | | | y Revision 2 (September 2002) |
| Case ID No. Reg. Ent. Reference No. | | | ′ | PCW Revision October 30, 2008 |
| Media [Statute] | | | | |
| Enf. Coordinator | | | | TITLE COMPANY |
| Violation Number Rule Cite(s) | 77860848 | | | On the H |
| · Rule Cite(s) | 1 (1) (2) (2) (2) (3) (3) (4) (4) (4) (4) (4) (4) (4) (4) (4) (4 | 0 Tex.: Admin. Code § 290.42(f) |)(2)(D) | 2.73 |
| · · · · · · · · · · · · · · · · · · · | | al feed system designed to min | | |
| | | rotection against backpressure tigation, it was observed that th | | |
| Violation Description | between the chloring | injection line that feeds upstre | am of the clarifiers and | the ^{in t} |
| | | at feeds post filtered water and eed line for the post filtered wat | | |
| • | | that feeds the upstream clari | | · |
| | | | Base Pe | enalty \$1,000 |
| and the state of t | Observation process (Sept. 1988) of the Observation (Sept. 1980) of the Observation (Sept. 198 | A control of the Angelot of the Ange | Dase Fe | #1,000 |
| >> Environmental, Prope | rty and Human He Har | | | |
| Release | | | | |
| OR Actua | | | 350 | |
| Potentia Potentia | | | Percent 25% | |
| >>Programmatic Matrix | | | | |
| Falsification | Major Mode | | Percent 0% | |
| | 3 rapas van gourn (religious rola) i gya jakisa saar | Congressing Security | 0,00 | |
| Fallure to pr | ovide a chemical feed sy | stem designed to prevent backr | oressure and siphoning o | ould l |
| | mers to a significant am | ount of contaminants which wo | ild not exceed levels the | |
| A Managa of Andropping Conference of Managara | protective of hur | nan health and environmental is | eceptors. | |
| The state of the s | | | ustment | \$750 |
| | | W3. | eediisiid | |
| • | | | | \$250 |
| ViolationEvents | | | | And the Control of th |
| | F 54.1 | 354 86 22 E | Number of violation day | 'S |
| | | | • | |
| | daily: | | | |
| | monthly | | | |
| mark only one with an x | | | Violation Base P | enalty \$250 |
| | semiannual | 986 (1960) 986 (1960) | | |
| | single event | | | |
| | Control Victoria Calabana | | | |
| One quarter | y event is recommended | from the initial date of the inve ning date, October 15, 2010, | stigation, July 21, 2010, | , to the |
| | SERC | intgradie, October a.s., 2010. | | |
| Good Faith Efforts to Con | np/v==================================== | 0.0% Reduction | | \$0 |
| The state of the s | Before | | er 1 | |
| | Extraordinary Ordinary | | | |
| | | (mark with x) | | |
| | ा ≅he R | espondent does not meet the go | ond faith criteria for | |
| | Notes | this violation. | Joan Laicer a no. | |
| | | | Violation St | ubtotal \$25 |
| | | | | |
| Economic Benefit (EB) fo | this violation | | Statutory Limit T | <u>est est established.</u> |
| Estima | ated EB Amount | \$72 | Violation Final Penalt | y Total \$34: |
| - | ` т | nis violation Final Assessed I | Penalty (adjusted for | limits) \$34 |
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| | E E | conomic | Benefit | Worl | ksheet | | 2.14.30.30 |
|--|--|--|--|--------------------------------|--|---|--|
| Respondent | City of Wills Po | olnt | | | * | | - Annual Control of the Control of t |
| Case ID No. | | | | | | | |
| eg. Ent. Reference No. | RN101388973 | | | | | 1.5 | |
| | Public Water S | upply | | | | BRIGGERS AND STREET, CARREST AND STREET | Years of |
| Violation No. | | . ФРР1) | | | | Percent Interest | Depreciation |
| The Property of the Control of the C | | | | CANADA STATE | | | and high mind and with |
| | | | | | | ವೆಉಪರ್ ಚಿತ್ರ 5.0 | . 15 |
| | Item Cost | Date Required | Final Date | Yrs I | nterest Saved | Onetime Costs | EB Amount |
| Item Description | -No commas or \$ | | | | | | |
| aj ke | ស្រែជាសាលាសាលា - | | the state of the | | esset. | | |
| Delayed Costs | argenda dan dinastrij | | | | | | us compension |
| Equipment | particular recognition and the | See Such sepres a year use. | TACK TRANSPORT OF CITE | 0.00 | \$0:2- | \$0 | \$0 |
| Buildings | | TO STATE SOME STATE | ir Silius privačkimi | 0.00 | ************************************** | (####### \$ 0############################# | \$0 |
| Other (as needed) | All Market Services | Sandan dari da | ente l'as éxil à l'est | 0.00 | ** \$0***** | | s0 |
| Engineering/construction | \$1 ,000 | 21-Jul-2010 | 1-Aug-2011 | 1.03 | \$ \$3.77 227 | \$69 | → \$72 ° |
| Land | March March | | | 0.00 | - \$0 | ar an in/as | ≈ ⊗\$0 |
| Record Keeping System : | owell throughtening in | Brandstand Comment | g50,2825076,0853617 | 0.00 | #\$\\\ \$0\\\ | te basen/arrana | ``≈\$0° |
| Training/Sampling | 1,000 100 100 100 100 100 100 100 100 10 | | | 0:00 | \$0 | zakaden/a zeze | × %,\$0 |
| Remediation/Disposal | #21 FA 152 AP 253 G | (Approximate) | | 0.00 | 45 SE \$0 6 SE SE | rate n/a | ::::\$0 ->≎: |
| Permit Costs | CHANGE TO SE | Mark XIVI Vitorio Como | A SELECTIFICATION . | 0.00 | \$0,000 | is the h/a are a | \$ 30 |
| Other (as needed) | | | | 0:00 | \$0. | la de la militario de la composición de | \$0 - |
| Notes for DELAYED costs | against back | 27 C 4 C 2 C 2 C 2 C 2 C 2 C 2 C 2 C 2 C 2 | noning, calculate | radio i della compania di Pari | ne initial date of | ed system so it prov the investigation to | and the said of |
| Avoided Costs | ANNUAL | IZE [1] avoided | l costs before | entering | item (except | for one-time avoi | ded costs) |
| Disposal | | | Section of war | 0.00 | ~~ *: \$0~~ | \$0 | \$0: |
| Personnel | 第6为第1条数与转移 | Frencis Charters (Co. Parc | | .0.00 ₫ | \$0 | ************************************** | 50 to 1 |
| nspection/Reporting/Sampling | | e Bushin godine | and the property | 0.00 | \$0 - | \$0 *** | |
| Supplies/equipment | 建 苯环烷基4种类4个点: | i katura postantijoje, iš s | For Full persons of exception | 0.00 | ÷ | \$0 | √: |
| Financial Assurance [2] | | | | 0.00 | \$ 0 | \$0 | **** \$ 0 |
| ONE-TIME avoided costs [3] | Section Co. | i ki Pskiheli katoli i | | 0.00 | ************************************** | \$0 · | < <p><<p><<p><<p><<p><</p></p></p></p></p> |
| Other (as needed) | | | | 0.00 | \$0 | \$0 | ± 4 × \$0 · · · |
| Notes for AVOIDED costs | | | 10 (10 (10 (10 (10 (10 (10 (10 (10 (10 (| | | | |
| Approx. Cost of Compliance | | \$1,000 | 7 | Say, | A TOTAL | | ¢7" |

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| | | 15-Oct-2010 | Docket N | lo. 2010-1721-MLM-E | | PCW |
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| | ondent D No. | City of Wills Point | | | | 2 (September 2002) |
| Reg. Ent. Refere | | | | | PCW Revisi | on October 30, 2008 |
| Media [S | Statute] | Public Water Supply | | | | 1 BL 24 T T T |
| | | Michaelie Sherlock | | | | delication of the state of the |
| | Number le Cite(s) | 9 1 1 | | | m2325882.223 | |
| Kui | ie Cite(s) | 30 Tex. Admin. Code §§ | 290.46(f)(2), 290.46(f) | (3)(B)(VI), and 290.46(f |)(3)(B)(v) | To be seen |
| | ļ | | Langua wenge en | | | |
| | | Falled to maintain the "Inspections Specifically." | Facility's operating reco | | | III. |
| Violation De | scription | | | | | |
| | - | eplant, and other estable | ishments, and flow mete | r calibration reports for | the raw, | or primare de |
| | | finished, and backflow p | revention meters at the | water treatment plant f | or review. | 50 SA C |
| | Į. | | | TO SECURE SECTION OF THE SECURE SECURE SECTION OF THE SECURE SECTION OF THE SECURE SEC | | a to the management |
| | | | | Bas | se Penalty | \$1,000 |
| >> Environmental | . Proper | ty and Human Heal | th Matrix | | 5 | or manuscraft |
| | | Harm | | | S | aboutly live |
| ÓR | Release Actual | Major Moderal | te Minor | | | , mary 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, |
| Providence of the second of th | Potential | | | Percent 0% | 1 | Graphin in Line |
| | do strati | | | - | - | 1 |
| >>Programmatic | Matrix Isification | Major Modera | te Minor | Committee of the Commit | | an |
| For control of the co | 15(1) | major modera | m 4 1 C mar m 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | Percent 10% | 1 | 1 |
| | | The state of the s | MORTH EXCESSION AND AND AND AND AND AND AND AND AND AN | | | |
| Matrix | - 1871 (**17.54) 7. July 3 | | CHARLEST AND | | | 12112141 |
| Notes | o Ermana | Between 30% ar | nd 70% of the requireme | nt was met, | | |
| A Price of Treat Part April 1987 | <u> </u> | | in Aldinov, consequences, p. R. (2002) | | | Andrew (With |
| In comment of a contract of a | | | | Adjustment | \$900 | |
| - Interest of the second of th | | | • | | Г | \$100 |
| | | w · · · | | | L | \$100 |
| Violation Events | | | | | | |
| , n | Number of ' | Violation Events | | Number of violation | n dave | 141 |
| | varriber of | VIOIBUOTI LVCITCS | Remains Francisco C | Namber of Violatio | · | to a go of the second |
| | | ai dally a | | | | TA CAMPAGE AND A STATE AND A S |
| | | weekly | 200000 | | | |
| | ark only one | monthly guarterly | | Violation Ba | se Penalty | \$100 |
| | with an x | semiannual | | | | |
| | | з априа | | | | - Acres de la company de la co |
| | | ≣single≡event: x | 96-96-1864C | | | in a start of the |
| | V>396 | | er en alla en | | N. Prince State | |
| | | One sii | ngle event is recommend | led: | | |
| | | | | 1989-21 V 313-21 A.J | | |
| Good Faith Efforts | s to Com | e (v | 0% Reduction | | | \$0 |
| Control of the Contro | energi v sindina Editheratura attituta e | Before N | | ent Offer | TO abanda como esta de suas é confederacions | , |
| | | Extraordinary | | <u> </u> | | |
| | | Ordinary | | great J | | and in contract of the contrac |
| | | 536,9139,000,19 | (mark with x) | | | , |
| | | Notes The Res | pondent does not meet l this violati | | r.[| |
| | | | iena vaoraci | V/),c | | |
| Page 1 | | | | Violatio | on Subtotal | \$100 |
| | | | | | | T |
| Econòmic Benefit | (EB) for | r this violation | | Statutory Lin | nt Test | |
| 10 to | Estima | ted EB Amount | \$4 | Violation Final Pe | enalty Total | \$137 |
| District the state of the state | | - | | | _ | \$137 |
| | | ini | s violation Final Asses | seu renany (aujustei | aioi milles) | \$13\ |

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| Respondent | | olnt | | | مائي در در ه | 1.8 \$25 P. L. | | |
| Case ID No. | 40581 | | | | | - 1 th | | |
| eg. Ent. Reference No. | | | | | | | | |
| | Public Water S | upply | | • | • • • | Percent Inter | PETERSON | ears of |
| Violation No. | . 9 Statement den den skappen for | INVESTMENT OF THE PROPERTY OF | | | The surprise of the control of the state of the control of the con | | negavis e ingrassio | reclation |
| charach de carrière | | | arabaya karbiya | | eraken erele | 579 | 5.0 | 15 |
| ere tracticambat i | | Date Required | Final Date: | Yrs⊣ In | terest Savec | i ∴ Onetime Cos | stsEB | Amount: |
| Item Description | No commas or \$ | | | 20.00 V 22.000 | HE STEET FOR DOOR STORE | | | |
| | | | | direti aderik | | Together State and S | | n-continues an |
| Delayed Costs | Page Page 2 of the Control of the Co | | | l on o l | \$0 | \$0 | | \$0 |
| Equipment Buildings | No. or insulation | 3450.050.050.000 | and the state of t | 0.00 | \$U************************************ | | 学结中 特定 | \$0 |
| Other (as needed) | 10042100401000 | sees and the sees of the sees | | 0.00 | \$0 \$0 | \$0 | 7 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | |
| Engineering/construction | Calculation Const. | | ecolorede (2.1200) | 0.00- | \$0 | 12 13 12 13 14 1 50 15 13 | | \$0. |
| Land | 644.5% E01214.085 E | | 1196 P. Lipsey, No. 7, Horsephy C. | 0.00 | r: 00 ⊈ 0 00 | ats/sats/n/ats/ats | 22.00 | \$0 |
| Record Keeping System | ####\$90 | 21-Jul-2010 | ≈ 1-Jun-2011+ | 0.86 | \$4······ | an nyand. | | \$4 |
| Training/Sampling | SEE STATE OF THE SECOND | ACTION OF THE SECTION | | 0.00 | ∵ `\$ 0 | c de de n∕aid; | | . 5 0 🚸 _ |
| Remediation/Disposal | 2005 (Sept. 1997) | | | 0.00 | \$ 0 | a = 5≟ n/a=≟ | A CONTRACTOR OF THE PARTY OF TH | - 50 |
| Permit Costs | Segular - Company | | CANCEL CONTROL | 0.00 | \$0 | isa masin/a s | | \$0 |
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| Other (as needed) | | sts are the estima | | | | | | |
| Other (as needed) Notes for DELAYED costs | Delayed co. backflow p | sts are the estima revention test rep inv | ted amount to lorts, and flow estigation to th | develop a neter calll e estimate | record keepin Pration reports ed data of com | s, calculated fron ipliance. | n the dat | records, e of the |
| , , | Delayed co. backflow p | sts are the estima | ted amount to lorts, and flow estigation to th | develop a neter calll e estimate entering | record keepin bration report ed date of con litem (excep | s, calculated fron ipliance. t for one-time a | n the dat | records; e of the costs) |
| Notes for DELAYED costs Avoided Costs Disposal | Delayed co. backflow p | sts are the estima revention test rep inv TZE [1] avoided | ted amount to orts, and flow estigation to th costs before | develop a meter calll e estimate entering | record keepin Station report d date of con item (except | s; calculated fron ipliance. t for one-time a | n the dat | records, e of the costs) |
| Notes for DELAYED costs AVOIDED GOSTS Disposal Personnel | Delayed co. backflow p | sts are the estima revention test rep inv JZE [1] avoided | ted amount to forts, and flow i estigation to the costs before | develop a neter call e estimate entering 10:00 | record keepin Station reports didate of con Item (except \$0 \$0 | s; calculated fron ipliance. t for one-time a \$0 \$0 | n the data | records; e of the costs) 50 |
| Avoided Costs Avoided Costs Disposal Personnel spection/Reporting/Sampling | Delayed co. backflow p | sts are the estima revention test rep inv JZE:[1] avoided | ted amount to jorts, and flow estigation to th costs before | develop a neter calll e estimate entering 10:00 10:00 | record keepin oration reports d date of com item (except \$0, \$0, | s, calculated from ipliance. t for one-time a \$0: \$0 \$0 | n the data | records; e of the costs) \$0 \$0 |
| Notes for DELAYED costs AVOIDED COSTS Disposal Personnel spection/Reporting/Sampling Supplies/equipment | Delayed co. backflow p | sts are the estima revention test rep inv IZE [1] avoided | ted amount to forts, and flow i estigation to the costs before | develop a neter calll e estimate entering 0:00 0:00 0:00 | record keepin pration reports d date of com item (except \$0 \$0 \$0 \$0 \$0 | s, calculated from ipliance. tifor one-time a | n the date | records, e of the costs) \$0 \$0 \$0 \$0 |
| Notes for DELAYED costs AVOIDED COSTS Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2] | Delayed co. backflow p | sts are the estima revention test rep inv JZE:[1] avoided | ted amount to jorts, and flow estigation to th costs before | develop a neter calle estimate entering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0. | record keepin pration report, ed date of con Item (except \$0 \$0, \$0, \$50, \$50, \$50, | s, calculated from inpliance. tifor one-time a so | n the date | records, e of the costs) \$0 \$0 |
| Notes for DELAYED costs AVOIDED COSTS Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] | Delayed co. backflow p | sts are the estima prevention test rep inv IZE [1] avoided | ted amount to jorts, and flow estigation to th costs before | develop a neter call estimate entering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0. | record keepin oration report. ed date of corn item (except \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 | s, calculated from pllance. tifor one-time a \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 | n the date | records, e of the costs) \$0 \$0 \$0 \$0 |
| Notes for DELAYED costs AVOIDED COSTS Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2] | Delayed co. backflow p | sts are the estima revention test rep inv IZE [1] avoided | ted amount to forts, and flow estigation to th costs before | develop a neter call estimate entering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0. | record keepin pration report, ed date of con Item (except \$0 \$0, \$0, \$50, \$50, \$50, | s, calculated from ppliance. tifor one-time a \$0: \$0 \$0 \$0 \$0 \$0 \$0 | n the date | records, e of the costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 |
| Notes for DELAYED costs AVOIDED COSTS Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] | Delayed co. backflow p | sts are the estima prevention test rep inv IZE [1] avoided | ted amount to forts, and flow estigation to th costs before | develop a neter call estimate entering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0. | record keepin oration report. ed date of corn item (except \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 | s, calculated from pllance. tifor one-time a \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 | n the date | records, e of the costs) |
| Notes for DELAYED costs AVOIDED COSTS Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] | Delayed co. backflow p | sts are the estima prevention test rep inv IZE [1] avoided | ted amount to forts, and flow estigation to th costs before | develop a neter call estimate entering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0. | record keepin oration report. ed date of corn item (except \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 | s, calculated from pllance. tifor one-time a \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 | n the date | records, e of the costs) |
| Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed) | Delayed co. backflow p | sts are the estima prevention test rep inv IZE [1] avoided | ted amount to forts, and flow estigation to th costs before | develop a neter call estimate entering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0. | record keepin oration report. ed date of corn item (except \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 | s, calculated from pllance. tifor one-time a \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 | n the date | records, e of the costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 |
| Avoided Costs Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed) | Delayed co. backflow p | sts are the estima prevention test rep inv IZE [1] avoided | ted amount to forts, and flow estigation to th costs before | develop a neter call estimate entering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0. | record keepin oration report. ed date of corn item (except \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 | s, calculated from pllance. tifor one-time a \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 | n the date | records, e of the |
| Avoided: Gosts Disposal Personnel aspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed) Notes for AVOIDED costs | Delayed co. backflow p | sts are the estima revention test rep inv JZE [1] avoided | ted amount to forts, and flow estigation to th costs before | develop a neter call estimate entering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0. | record keepin bration report. d date of cor item (except \$0, \$0, \$0, \$0, \$0, \$0, \$0, \$0, \$0, \$0, | s, calculated from ipliance. t for one-time a so | n the date | records, e of the costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 |
| Avoided Costs Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed) | Delayed co. backflow p | sts are the estima prevention test rep inv IZE [1] avoided | ted amount to forts, and flow estigation to th costs before | develop a neter call estimate entering 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0. | record keepin oration report. ed date of corn item (except \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 | s, calculated from ipliance. t for one-time a so | n the date | records, e of the costs) |

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| Screening Date | 15-Oct-2010 City of Wills Point | Docket I | √o , 2010-1721-MLM-E | PGW olicy Revision 2 (September 2002) |
|--|--|--|--|--|
| Case ID No. | 40581 | | . 14 | PCW Revision October 30, 2008 |
| Reg. Ent. Reference No. Media [Statute] | | | | |
| Enf. Coordinator | Michaelle Sherlock | | | and the second |
| Violation Number Rule Cite(s) | F. VSc. Statistics of the State of the second | 30 Tex Admin, Code § | annicus · | |
| | A TOMAN A PARAMETER STATE | A COMPANY OF STREET | | |
| Violation Description | alternative customer service investigation service inspections for the | vice inspection certificat , it was observed that t | utive Director before using e ("CSI") form: Specifically perindividual performing cur im that did not have the m (47) Appendix D | , at the stomer: |
| | | | Base | Penalty \$1,000 |
| >> Environmental, Proper | ty and Human Heali | h Matrix | | |
| Release | Harm Major Moderate | e Minor | | • |
| OR Actual Potential | | | Percent 0% | • |
| | | | Percent 070 | |
| >>Programmatic Matrix Falsification | Major Moderat | e Minor | Levie | |
| 3.491.7826.48663.4 | 24.52 X 55.55 (55.55) | | Percent 25% | |
| Material Material | and the second s | in de la companya de | | |
| Matrix Notes | 100% of the | rule requirement was i | notimetr | |
| | Andrew To the Agricultural American Assessment College | | THE REAL PROPERTY OF THE PROPE | 1950 |
| | | | Adjustment | \$750 |
| | | | · | \$250 |
| Violation Events | | | | The second secon |
| Number of | Violation Events | 80 | 5% Number of violation d | lays |
| | daily | | | |
| | weekly monthly | 999. 96a | | |
| mark only one with an x | - quarterly | | Violation Base | Penalty \$250 |
| | semiannual | | | |
| | single event x | 14.00 mg 14.00 mg | | |
| | | | | |
| | | igle event is recommen | Talapata da talan da kacamatan d | |
| Good Faith Efforts to Con | astv | 0% Reduction | | |
| | Before N | | ient Offer | |
| | Extraordinary Ordinary | | <u></u> | |
| | N/A | (mark with x) | | |
| | Notes The Resp | pondent does not meet this violat | the good falth criteria för lon. | • |
| | | | Violation | Subtotal \$25 |
| Economic Benefit (EB) fo | r this violation | | Statutory Limit | Test |
| | ated EB Amount | \$2 | Violation Final Pen | alty Total \$34 |
| | | | ssed Penalty (adjusted f | |
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Economic Benefit Worksheet Respondent City of Wills Point Case ID No. 40581 Reg. Ent. Reference No. RN101388973 Media Public Water Supply . 砂ケー・カから Years of Percent Interest Depreciation Violation No. 10 - / 5.0 P 15 Item Cost Date Required Final Date Yrs Interest Saved Onetime Costs Item Description No commas or \$ Delayed Costs Equipment 0:00 \$0 \$0≥-Buildings₄ 0.00 \$0 \$0 \$0 Other (as needed) 0.00 \$0 \$0 \$0 Engineering/construction 0.00 :\$0-50 **5**0 Land 0.00 \$0≈ in/a \$0 Record Keeping System 0.00 \$0 Training/Sampling 0.00 \$0 Remediation/Disposal 0.00 <u>\$</u>0 \$0 Permit Costs 0.00 Other (as needed) 0.86 Delayed costs include the estimated amount to update the customer inspection certificate forms or obtain Notes for DELAYED costs Executive Director approval, calculated from the investigation date to the estimated date of compliance. ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs) Avoided Costs Disposal 0.00 Personnel 0.00 \$0 Inspection/Reporting/Sampling 0.00 \$0 Supplies/equipment 0.00 \$0 \$0 \$0 Financial Assurance [2] \$0 0.00 \$0 ONE-TIME avoided costs [3] 0.00 50 \$0 \$0 Other (as needed) 0.00 ,Notes for AVOIDED costs Approx. Cost of Compliance \$45

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| Screening Date | | Docket No. 2010-1721-MLM-E | PCW |
|--|--|--|--|
| Respondent Case ID No. | City of Wills Point | | Policy Revision 2 (September 2002) PCW Revision October 30, 2008 |
| Reg. Ent. Reference No. | RN101388973 | | , 5, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, |
| Media [Statute] | | | general to inspec |
| Enf. Coordinator Violation Number | | | - Copy of the Copy |
| Rule Cite(s) | | 30 Tex. Admin: Code § 290.46(m) | |
| | Britan Amerikaan (1991) (1991) (1994) | | <u> </u> |
| | | enance and housekeeping practices to ensure the heral appearance of the system's facilities and e | |
| Violation Description | | e of the investigation, it was observed that the c at was beginning to flake off and had extensive | |
| Violation Description | the modulating valve or | nfilter No. 1 was not working, the fencing close t | o the old |
| | | essive vines and brush growing on it, and the co eifor the caustic day tank had a hole in it. | ntainment |
| | Programme Company | Signaturies Significances | |
| | | Bas | se Penalty \$1,000 |
| >> Environmental, Proper | | | |
| Release | Harm Major Modera | | |
| OR Actual Potentia | | |] |
| POLETICAL Service and the ser | The state of the s | Percent 1076 | |
| >> Programmatic Matrix Falsification | Major Modera | te Minor | 11 - 12 - 12 - 12 - 12 - 12 - 12 - 12 - |
| Taisin Cacion | Major Modera | Percent 0% | |
| Experience Control Con | | | |
| Matrix equipment co | ensure the good working uld expose customers of t | condition and general appearance of the Facility he Facility to an insignificant amount of contamin | and its |
| Notes Notes | would not exceed le | /els.that are protective of human health: | |
| | | Adjustment | \$900] |
| | | | \$100 |
| | | | 1 |
| Violation Events | | | Committee to the second |
| Number of | Violation Events | Number of violatio | n days |
| | dally | WAA | |
| | - Weekly - | | |
| mark only one | monthly guarterly | Violation Ba | ise Penalty \$400 |
| with an x | semiannual | | - + |
| | annual x | | |
| | | | |
| | Four single events are rec | ommended (one for each housekeeping issue). | |
| | | | |
| Good Faith Efforts to Con | npl v o | 0% Reduction | \$0 |
| ge en en gegen en en frank voor volgholder in meering voor 200 maart vierbet voor 100 maart 200 maart 200 maard | Before I | | |
| PM - 0409441-1-1 | Extraordinary Ordinary | | |
| · · | · | ((mark with x) | 1 |
| | The Re | spondent does not meet the good faith criteria fo | r |
| | | this violation. | |
| . 6 | | Violati | on Subtotal \$400 |
| Economic Benefit (EB) fo | r-this violation | Statutory Lin | nit Test |
| Estima | ated EB Amount | \$121 Violation Final P | enalty Total \$548 |
| | 3 | is violation Final Assessed Penalty (adjuste | d for limits) \$548 |
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Economic Benefit Worksheet Respondent City of Wills Point . of 5 % Case ID No. 40581 Reg. Ent. Reference No. RN101388973 Media Public Water Supply Percent Interest Years of Depreciation Violation No. 11 Item Cost Date Required Final Date Yrs Interest Saved Onetime Costs Item Description No commas or \$ Delayed Costs Equipment 0.00 Buildings 0.00 0.86 Other (as needed) .0.00 Engineering/construction \$0 Land Record Keeping System 0.00 \$0 0.00 \$0 ≕n/a Training/Sampling 0.00 \$0. \$0. Remediation/Disposal 0.00 \$0 \$0 Permit Costs Other (as needed) 0.00 Delayed costs include the estimated amount to repair corrosion and paint on the clarifier supply lines, replace the modulating valve, remove vines and brush, and repair the containment structure for the Notes for DELAYED costs caustic tank, calculated from the date of the investigation to the estimated date of compliance. ANNUALIZE 1 avoided costs before entering item (except for one-time avoided costs) Avoided Costs -0.00 Z \$0 \$0 Disposal \$0 Personnel 0.00 \$0 Š0 ∴\$0∍ \$0 Inspection/Reporting/Sampling 0.00 \$0 0.00 Supplies/equipment \$0 ₹\$0__ Financial Assurance [2] 0.00 **.**50.. ONE-TIME avoided costs [3] 0.00 Other (as needed) Notes for AVOIDED costs TOTAL \$2,000 \$121 Approx. Cost of Compliance

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| Screening Date Respondent | 15-Oct-2010 City of Wills Point | Docket∃ | No: 2010-1721-MLM-E | Policy Revision 2 | PCW (September 2002) |
|--|---|---|---|-------------------|--|
| Case ID No. Reg. Ent. Reference No. | 40581 | | | | October 30, 2008 |
| Media [Statute] | | | | | - |
| Enf. Coordinator | Michaelle Sherlock | | | | - |
| V12 Rule Cite(s) | | Admin Codes 100 | AE(| XX3: 1 | new teachers |
| - | 3.031 | ex. Admin. Code § 290 | r.+b(m)(±)(A) | | The state of the s |
| Violation Description | protection to all metal su investigation, the inside o | orfaces on an annual ba of the tanks were not in | vated storage tanks for ade isis. Specifically, at the time spected annually to ensure tion to all metal surfaces. | e of the | mali-jenis discolarina come de la |
| Page against to | | | Base | Penalty | \$1,000 |
| >> Environmental, Proper | | h Matrix | | | · njaroni |
| Release | Harm <u>Major Moderat</u> | e Minor | | | |
| OR Actual Potential | | | Percent 10% | | |
| | Frankster Carray and All State Control of State | State of the Control | Percent 10% | | r) I was a second of |
| >>Programmatic Matrix Falsification | Major Moderat | e Minor | And Andrews | | |
| | | | Percent 0% | | - UV ANNAMA |
| | rform an annual inspection. | | | ld recult | Book (CANADA |
| | ion of tank defects that cou | id expose customers of | the Facility to insignificant | | U Appen ui am |
| Notes Notes | of contaminants are or | which would not excee stective of human healt | d levels that h | | nation of the |
| And the second s | | | | | ngu san s |
| | | | Adjustment | \$900} | w. |
| | | | | | \$100 |
| Violation Events | | | | | n milyen |
| Number of | Violation Events | 81 | Number of violation of | days | A Late out Modern de se mande |
| mark only one with an x | daily weekly monthly guarterly semiannual x | | Violation Base | e Penalty | \$300 |
| | iree annual events are reco | mmended∦one for eac | h elevated storage tank). | | an manager of chanding deployment of the chanding of the chand |
| Good Faith Efforts to Con | | 0% Reduction | | | \$0 |
| | Before No Extraordinary | OV NOV to EDPRP/Settlem | | | |
| 4 | Ordinary | | ''''''''''' | | |
| | N/A XXXXIII Notes | | the good falth criteria for | | |
| | | | | | |
| | | | Violation | Subtotal | \$300 |
| Economic Benefit (EB) fo | r this violation | | Statutory Limit | Test | |
| Estima | ated EB Amount | \$129 | Violation Final Pen | alty Total | \$411 |
| THE RESIDENCE OF THE PARTY OF T | This | violation Final Asse | ssed Penalty (adjusted f | or limits) | \$411 |
| | | | | | |

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Economic Benefit Worksheet Respondent City of Wills Point Case ID No. 40581 Reg. Ent. Reference No. RN101388973 Media Public Water Supply Tenedalin<u>e (</u>A) ablær Violation No. 12 Depreciation Item Cost Date Required Final Date Yrs: Interest Saved: Onetime Costs: FItem Description No commas of \$ Delayed Costs Equipment 0.00 Buildings 0,00 \$0 Other (as needed) :0:00 \$0 \$0 \$0 Engineering/construction 0.00 \$0 \$0 Land 0.00 Record Keeping System 0.00 \$0 Training/Sampling 0.00 \$0 -Remediation/Disposal 0.00 Permit Costs 0.00 Other (as needed) Notes for DELAYED costs ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs) Avoided Costs Disposal 0.00 50 Personnel 0.00 Inspection/Reporting/Sampling 1.00 \$6 Supplies/equipment 0.00 * \$0 · s Financial Assurance [2] 0.00 \$0 :\$0 ONE-TIME avoided costs [3] 0.00 · \$0. Other (as needed) 0.00 \$0 The avoided cost includes the estimated amount to inspect the internal coating of the Facility's three Notes for AVOIDED costs elevated storage tanks, calculated for the one year prior to the investigation. Approx. Cost of Compliance \$123 TOTAL \$129

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| Screening Date | 15-Oct-2010 City of Wills Point | Docket_N | lo. 2010-1721-MLM-E | PCW Policy Revision 2 (September 2002) |
|--|--|---|--|--|
| Case ID No. | 40581 | | | PCW Revision October 30, 2008 |
| Reg. Ent. Reference No. Media [Statute] | | | | |
| Enf. Coordinator | Michaelle Sherlock | | | |
| Violation Number Rule Cite(s) | 2 (20,000) 000 000 000 000 000 000 000 000 0 | Tex: Admin. Code 290 | | |
| | SU | rex. Admin. Code 23c | /HO((11)(H) | |
| Violation Description | facilities, distribution sys condition and free of exces the y | tëm lines; and related sive solids: Specificall väste lagoon had exce | | rtight tigation, |
| | | | Base | Penalty \$1,000 |
| >> Environmental, Prope | | Matrix | | 17.7 |
| Release | I all the second | Minor | | |
| OR Actua Potentia | | | Percent 50% | **** |
| >>Programmatic Matrix | | | Print Thomas Marie | |
| Falsification | Major Moderate | Minor | The state of the s | descriptions |
| | | (Augustian) | Percent 0% | Experiment of the second of th |
| Matrix If the sludg | e lagoons are not properly ma | ajntained, wastewater | from the treatment proce | SS COUID |
| Notes OVERTION A | nd cause significant amounts levels protective of hum. | | | exceed- |
| The second distribution of the second | | | | eron! |
| | | | Adjustment | \$500 |
| | | | ************************************** | \$500 |
| Violation Events | | | | Teather and |
| . Number of | Violation Events | | Number of violation | days |
| mark only one with an x | daily weekly monthly guarterly semiannual arnual single event | | Violation Bas | e Penalty \$1,500 |
| Three-month | aly events are recommended the screen | from the initial date o no date, October 15; | | , 2010, to |
| Good Earth Efforts to Con | | % Reduction | | \$0 |
| | Before NOV Extraordinary | NOV to EDPRP/Settleme | ent Offer | |
| | Ordinary | | | |
| | 1854-001951 \$1.3.150 | (mark with x) ndent does not meet this violati | the good faith criteria for on: | , |
| | | | Violatio | n Subtotal \$1,500 |
| Economic Benefit (EB) fo | or this violation | | Statutory Limi | t Test |
| | ated EB Amount | \$1,139 | Violation Final Per | |
| Latini | | | ssed Penalty (adjusted | |
| | IMS | noration (That Asses | securencity (aujusteu | ror milica)i acron |

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Economic Benefit Worksheet 计设计特殊编码 医水类 Respondent City of Wills Point. Case ID No. 40581 Reg: Ent. Reference No. RN101388973 Media Public Water Supply Short SAN OF Percent Interest Violation No. 13 Item Cost Date Required Final Date Yrs Interest Saved Onetime Costs Item Description No commas or Delayed Costs Equipment 0.00 \$0 Buildings 0.00 \$0 **¢**n \$0 Other (as needed). 0.00 \$0 : \$0 \$0 Engineering/construction 0.00 - \$0 \$0 0.00 \$0 Record Keeping System 0.00 Training/Sampling 0.00 \$0 Remediation/Disposal 1.03 Permit Costs 0:00 \$0 Other (as needed) 0.00 Delayed costs include the estimated amount to remove the excess solids from the waste lagoon and to develop a solids removal plan to prevent reoccurrence, calculated from the investigation date to the Notes for DELAYED costs estimated date of compliance. ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs) Avoided Costs 0.00 5 50 Disposal 0.00 Personnel Inspection/Reporting/Sampling 0.00 \$0 Supplies/equipment \$0~ \$0 0.00 Financial Assurance [2] 0.00 \$0 ÷\$0-50 ONE-TIME avoided costs [3] 0.00 \$0 Other (as needed) Notes for AVOIDED costs Approx. Cost of Compliance £- \$22,119 TOTAL

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| Screening Date | | Docket No. 2010-1721-MLM-E | PCW |
|---|---|--|--|
| Respondent Case ID No. | City of Willis Point 40581 | • | n 2 (September 2002) sion October 30, 2008 |
| Reg. Ent. Reference No. | RN101388973 | | |
| Media [Statute] Enf. Coordinator | | | To the Control of the |
| Violation Number | 14 | | att of transport |
| Rule Cite(s) | 30 Tex. Admin. Code §§ 2 | 90.46(s)(2); 290.46(s)(2)(A)(ii); and 290.46(s)(2)(B)(iv) | an annota nilytis |
| | Fälled to properly calibra | e egulpment used for compliance testing. Specifically, at | AN Annana |
| | | ation, it was observed that the pH buffers and fluoride out of date, the accuracy of the ammonia calonmeter was | gen of believed to |
| Violation Description | not being verified against | secondary standards once every 30 days, the callbration | is wyrma el |
| | | rs was not being verified once per week, and the fluoride. yerified against secondary standards once every 30 days. | THE PERSON NAMED IN COLUMN NAM |
| · | | | es epige sund es |
| | | Base Penalty[| \$1,000 |
| >> Environmental, Prope | | h Matrix | - |
| Release | | | trong (typical |
| OR - Actua Potentia | | Percent 10% | армуаг |
| | * <u> </u> | and the control of th | and measureds |
| >>Programmatic Matrix Falsification | Major Moderat | e Minor . | action (Figure 1974) |
| | | Percent 0% | • • • • • • • • • • • • • • • • • • • |
| Fallure to ca | ibrate equipment used for a | ompliance testing could cause customers of the Facility to | |
| | d to insignificant amounts o | r contaminants, which would not exceed levels that are | T. In property of |
| | Professional Control of the Control | ctive of human health: | |
| | | Adjustment \$900 | a a a a a a a a a a a a a a a a a a a |
| | | | . \$100 |
| Violation Events | | | ander 1999 et al. |
| | Violation Events 4 | Number of violation days | a dipantanganan maga |
| | daily | | Opening 1112 |
| d 1 | weekly monthly | | and the state of t |
| mark only one with an x | guarterly | -(| \$400 |
| Will all X | semiannual | 281 0003 | |
| | single event x | | |
| | | | ì |
| 4 | Four single events are | recommended (one for each deficiency). | - |
| <u> </u> | | | |
| Good Faith Efforts to Con | n ply 0.0 Before N | 3 (2) 1 (2) 1 (3) (3) (4) (4) (4) (4) (4) (4) (4) (4) (4) (4 | \$0 |
| | Extraordinary | | |
| | Ordinary N/A x | (mark with x) | |
| Total Control of the | | ondent does not meet the good faith criteria for | |
| | | this violation | |
| | | Violation Subtotal | \$400 |
| Economic Benefit (EB) fo | r this violation | Statutory Limit Test | |
| Estima | ated EB Amount | \$62 Violation Final Penalty Total | \$548 |
| - | This | violation Final Assessed Penalty (adjusted for limits) | \$548 |
| | | | A CONTROL OF THE PROPERTY OF T |

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Economic Benefit Worksheet Respondent City of Wills Point Case ID No. 40581 Reg. Ent. Reference No. RN101388973 Media Public Water Supply Violation No. 14 5.0 Item Cost Date Required :: Final Date Yrs Interest Saved Onetime Costs Item Description No commas or \$ Delayed Costs Equipment 1-Jun-2011 0.86 Buildings 0.00 \$0 Other (as needed) 0.00 \$0 \$0 \$0 Engineering/construction 0.00 \$0 0.00 + \$0 Record Keeping System 0.00 Training/Sampling 0:00 ŝ0 Remediation/Disposal 0.00 \$0 Permit Costs 0.00 \$0. Other (as needed) 0.00 \$0 Delayed cost includes the estimated amount to replace buffers and secondary standards, calculated from Notes for DELAYED costs the investigation date to the estimated date of compliance. ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs) Avoided Costs 0.00 Disposal \$0 Personnel .0.00 Inspection/Reporting/Sampling 0.08 \$0 0.00 \$0∞ \$0 **≈:\$0**; Supplies/equipment Financial Assurance [2] .0 :00 \$0 \$0 ONE-TIME avoided costs [3]. 0.00 \$0-**\$**0 Other (as needed)-21-Jul-2010 0.00 \$0 Avoided inspection/reporting/sampling cost includes the estimated amount to verify the accuracy of the a mnormal calorimeter and the fluoride testing kit every 30 days, calculated for 30 days prior to the date of Notes for AVOIDED costs the Investigation. Avoided other cost includes the estimated amount to calibrate the online turbidimeters weekly, calculated for the seven days prior to the investigation... TOTAL \$200 Approx. Cost of Compliance

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| Screening Date | 15-Oct-2010 City of Wills Point | Docket N | o: 2010-1721-MLM-E | Policy Pavision | PCW 2 (September 2002) |
|----------------------------------|--|--|--|---|--|
| Case ID No. | 40581 | | | • | on October 30, 2008 |
| Reg. Ent. Reference No. | | | | | V-q-v-q- |
| Media [Statute] Enf. Coordinator | | | | | . • |
| Violation Number | | | | | |
| Rule Cite(s) | 30 | Tex. Admin. Code § 29 | 0110(b)(4) | | · · |
| | | to San Be 200 Car | | | |
| 1 | Failed to maintain the r system at a minimum of C | | centration within the dist | | Landersphare |
| Violation Description | the time of the investigati | lon, chloramine residual | In the Industrial Park an | d Eastside | • |
| | | ited storage tanks was (| | Section Control | · · · · · · · · · · · · · · · · · · · |
| | the property of the second section of the second | | Application for the property of the resolution | From A Market Courses in | |
| | | | Bas | e Penalty | \$1,000 |
| >> Environmental, Prope | ty and Human Heal | h Matrix | | | The state of the s |
| Release | Harm | ************************************** | | | Lawrence buy |
| OR Actua | | e ranot | | | I transcol (efec |
| Potentia | X | | Percent 50% | | |
| >>Programmatic Matrix | | | The state of the s | | and constitution of the first o |
| Falsification | Major Moderat | | | , | |
| | Santa Barta Alarena (h. 1821). | Joseph State | Percent 0% | | a Paging Managar |
| Eallure to ma | intain the proper disinfect | anteresidual throughout | the distribution system a | t all times | |
| Matrix could exp | ose consumers to a signific | ant amount of contamir | nants which would exceed | levels | |
| Establish | prot | ective of human health. | And the second of the second o | X-1/2 T-8876 | ADDURA DA AL |
| | | | Adjustment | \$500 | T. C. |
| | - | | | Г | \$500 |
| | | | Property of the State of the St | To propre proposala de la La La Cala de La La Cala de La Calada de La Cala de La Calada de La Cala | 7 |
| Violation Events | | | | | THE DESIGNATION OF THE PERSON |
| Number of | Violation Events | 353.1 | Number of violation | n days | many quintit |
| | | artife.es | ···· | | i pagrad del |
| | dajly weekly | | | | To PANESSANI |
| mark only one | monthly | | | | 4500 |
| with an x | = quarterly = | | Violation Ba | se Penalty | \$500 |
| | annual | | | | E inches |
| | single event: x | | | | |
| | | | | - 17 17 3 | . many novi and participation of the participation |
| | One sir | igle event is recommen | déd: | | |
| | | | Militaria et et l'Alliani autoritation | | Eggin i rappy |
| Good Faith Efforts to Con | | 0% Reduction | | | \$125 |
| | Before N Extraordinary | OV NOV to EDPRP/Settlem | ent Offer | | 100 mg |
| | Ordinary | | | | į |
| | N/A (3.3.3.3.3.3.3.3.3.3.3.3.3.3.3.3.3.3.3. | (mark with x) | | ≕ a | * |
| | The Res | spondent achieved comp | ollance with this violation | | |
| | Notes | on July 26, | 2010. | | |
| | 1 | | | 6. t. · · · · | 1075 |
| | | | Violatio | on Subtotal | \$375 |
| Economic Benefit (EB) fo | r this violation | | Statutory Lim | lt Test | |
| Estima | sted EB Amount | \$200 | Violation Final Pe | nalty Total | \$560 |
| | <u> </u> | | ssed Penalty (adjusted | | \$560 |
| | ini | s violación Final Asse | sseu renany (adjusted | 4 101 HHIILS) | 9000 |

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| Case ID No. | 40581 | | | | | | |
| eg. Ent. Reference No. | | | | | | | |
| | Public Water St | hbbla | | | * * * | Percent Interest | Years of |
| Violation No. | 15 | ASSESSED DE L'ARTINGUE DE L'AR | jaranistana indoperatina da sa | Transfer Heigher | SKEETKASTERFECKES | | Depreciation |
| | | tariyatanın bil | İştaranı 154 | | | 5.0 | 1 |
| | - Item Cost | Date Required | Final Date | Yrs Int | erest Save | d Onetime Costs | EB Amount |
| Item Description | No commas or \$ | | | | | | wite the enoughtion |
| Service of the control of the contro | p | Additional to the second of the second secon | | | | | |
| Delayed Costs | | | | | | | |
| Equipment | de de la companya de | | | 0.00 | \$0 ** | 50 × × × × × × × × × × × × × × × × × × × | (1985年) (1980年) · |
| Buildings ' | CERTAIN THE PROPERTY. | Market Strategy (STATE) | AND TOURS OF THE STATE OF | 0.00 | \$0 | \$0 | ** *\$0 |
| Other (as needed) | | CONTRACTOR OF STREET | ACS TANK KARANE | 0.00 | - \$0 <u>_</u> | \$0 | \$035 |
| Engineering/construction | Vijes at Telegraphy | | Zengality on the distributed of | 0:00 | \$0 | \$0 | * \$00. |
| Land | CONTRACTOR OF THE PARTY OF THE | | BASKAR STORES | 0.00 | * \$0 5200 | n/a. | \$0 |
| Record Keeping System | | ANTENNE ARELLE AND | | 0.00 | \$00.564 | n/a | \$ \$0 |
| Training/Sampling | DATE OF THE PARTY | AT SAUDINE SE DE SE COMPANION DE COMPANION D | *************************************** | 0.00 | \$0 | in in a sin/a sin in | \$0 |
| Remediation/Disposal | 通过5 6000000 | your designations. | | 0.00 | ÷ \$0 | in in/a | , \$ 0 |
| Permit Costs | | II PREFERENCE MERKE | | 0.00 \$ | ** \$0 | at 4 in/a | 3444\$0···· |
| Other (as needed) | Alexander Services | | | 0.00 | \$0- | a sinya mini | \$0 |
| | | | os diakinas | | N. 91. 20. 170.17 | | |
| | | CONTRACTOR | rt apartum ayakan a | | | | |
| Notes for DELAYED costs | | . Projetim piecemiec | | A PSE OF LOSS HAS | | og og her bled skip en er er | |
| | Exciting a | | | | o problem | er pou en proposit di parte di | 4 15 00 1 14 1 1 1 4 1 4 1 4 1 4 1 4 1 4 1 4 |
| | ANNUAL | IZE [1] avoided | costs before e | ntering i | tem (excer | it for one-time avo | ided costs) |
| Avoided Costs | | No. and the 21 page of the self- | ent on committees and making of | | 50 \$0 | | |
| Avoided Costs | M ATE DATE TO VALORIZE T | Delication of the second | | 0.00 | 5 U | [\$0 | \$0 → |
| Disposal | SO ALCOHOLOGICA | erberiere e ecce. | | 0.00 | su | \$0 \$0 | \$0 |
| Disposal Personnel | Mire periodic processors | | | | | | |
| Disposal Personnel spection/Reporting/Sampling | Mire periodic processors | | | 0.00 | \$0 | \$0 <u></u> | \$0 |
| Disposal Personnel Ispection/Reporting/Sampling Supplies/equipment | Mire periodic processors | | | 0.00 | \$0 \$0 | \$0 \$0 | \$0 <i>:</i> \$0 |
| Disposal Personnel spection/Reporting/Sampling | Mire periodic processors | 21-2010 | 26-Jul-2010 | 0.00 0.00 | \$0 \$0 \$0 | \$0 \$0 \$0 | \$0/ \$0 \$0 |
| Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] | CANADA CA | | 26-Jul-2010 | 0.00 0.00 0.00 | \$0 \$0 \$0 \$0 | \$0 \$0 \$0 \$0 | \$0 \$0 \$0 \$0 |
| Disposal Personnel Ispection/Reporting/Sampling Supplies/equipment Financial Assurance [2] | \$100 \$100 \$100 \$100 \$200 \$200 | 21-Jul-2010 | | 0.00 0.00 0.00 0.00 0.00 0.00 | \$0 \$0 \$0 \$0 \$0 \$0 | \$0 \$0 \$0 \$200 | \$0 \$0 \$0 \$0 \$200 \$200 |
| Disposal Personnel Aspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] | September 200 | 21-Jul-2010 | the estimated | 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0 | \$0 \$0 \$0 \$0 \$0 \$0 \$0 | \$0 \$0 \$0 \$200 \$200 maintenance and ove | \$0 \$0 \$0 \$200 \$200 F300 |
| Disposal Personnel Ispection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] | September 200 | 21-Jul-2010 | the estimated | 0.00 | \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 | \$0 \$0 \$0 \$200 | \$0 \$0 \$0 \$200 \$200 F300 |
| Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed) | September 200 | 21-Jul-2010 | the estimated | 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0 | \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 | \$0 \$0 \$0 \$200 \$200 maintenance and ove | \$0 \$0 \$0 \$200 \$200 F300 \$100 \$100 \$100 \$100 \$100 \$100 \$100 \$ |
| Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed) | September 200 | 21-Jul-2010 | the estimated | 0.00 | \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 | \$0 \$0 \$0 \$200 \$200 maintenance and ove | \$0 \$0 \$0 \$200 \$200 F300 \$100 \$100 \$100 \$100 \$100 \$100 \$100 \$ |
| Disposal Personnel spection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed) | Section 200 | 21-Jul-2010 | the estimated | 0.00 | \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 | \$0 \$0 \$0 \$200 \$200 naintenance and ove the investigation date | \$0 \$0 \$0 \$200 \$200 F300 \$100 \$100 \$100 \$100 \$100 \$100 \$100 \$ |

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| Screening Date | | Docket No. 2 | 010-1721-MLM-E | PCW |
|--|--|--|--|--|
| Respondent Case ID No: | City of Wills Point | | · | Revision 2 (September 2002) W Revision October 30, 2008 |
| Reg. Ent. Reference No. | | | ٣٠ | W KEVISION OCCODE 30, 2000 |
| Media [Statute] | Public Water Supply | | | |
| Enf. Coordinator Violation Number | | | | |
| Rule Cite(s) | Statistical Control of the Control o | | 1)(2)(B) | |
| | Falled to monitor | he performance of the disinfection | on zones according to the | 37 Ann |
| · Violation Description | Facility's most curren study approval letter the disinfection residu | the period of the control of the control of the interest of the characteristics and ing LAS upstream of the characteristics. | infection contact time ("C vestigation it was noted t collected at location D2A lorine injection point. | hat and |
| | | | Base Pen | alty \$1,000 |
| >> Environmental, Proper | | | | adverse of the season |
| Release | | rm erate Minor | | |
| OR Actual Potentia | | | Percent 50% | w my provide |
| | yelen Weiser Voorge striket Menderka a | | 150 70 | ro-pagarinamen |
| >>Programmatic Matrix Falsification | Major Mod | erate Minor | | . () |
| | | | Percent 0% | r |
| | Congress of Congre | | | 62. |
| Matrix plan and CT s | tudy could lead to non- | ormance of the disinfection zones detection of a treatment techniq | ue problem within the sys | tem, |
| Notes causing cu | | to a significant amount of contain is protective of human health. | ninants which would excee | ed |
| Company of the Compan | 2 | 15 Di otcedi Colorida i di cida di Colorida | Set in the second of the second | |
| | | Adj | ustment | \$500] |
| • " | | • | | \$500 |
| Violation Events | | | | |
| | Violation Events | 3 | Number of violation days | To the state of th |
| | daily | | | A MARINE AND THE PERSON AND THE PERS |
| | weekly | | | To the control of the |
| mark only one with an x | monthly guarterly | X | Violation Base Pe | nalty \$1,500 |
| with all x | semiannual. | | | |
| | annual single event | 7396362 386000 | | 1 |
| | 2000 2000 2000 | Correspondence (Section 10 Abras 10 October 1000000000000000000000000000000000000 | 2442 | |
| Three mon | | nended from the initial date of th he screening date, October 15, 2 | | 21, |
| | 2010, 60 | rieseraering date, october 1372 | | |
| Good Faith Efforts to Con | nply Sales | 0.0% Reduction | | \$0 |
| | T | re NOV NOV to EDPRP/Settlement Off | ēr . | |
| | Ordinary (%) | | , | and the second second |
| | N/A | x (mark with x) | 2 | [|
| | Notes The | Respondent does not meet the go this violation. | ood faith criteria for | |
| ; 1 | \ | | Violation Sul | ototal \$1,500 |
| Economic Benefit (EB) fo | r this violation | | Statutory Limit Te | and a second sec |
| | | | | |
| Estima | ated EB Amount | | Violation Final Penalty | |
| many literature in the second will be a second with the second second second second second second second second | | This violation Final Assessed | Penalty (adjusted for l | mits) \$2,055 |

| | aaaara E | conómic l | Benefit: | WOL | 'ksheet | | |
|--|--|--|--|-----------------------|--|--|---|
| Respondent | COLUMN TO THE PROPERTY OF THE | kapat kanan gapan gapan kanan dan kanan dan kanan dan kanan dan dan kanan kanan dan dalam kanan dan dalam kana | erccerement discover and a constraint of the con | tus a Mainrich Martin | ar merita pagagalan dipangan pagaman pagaman dipangan dip | The second secon | MITTEL AND A STANDARD SOMETHING STREET, STANDARD STANDARD |
| Case ID No. | • | | | | | | |
| THE STATE OF THE S | | | | | | | 1 At 3 3 A |
| Reg. Ent. Reference No. | | s made | | | | | Years of |
| | Public Water S | шрріу | | | | Percent Interest | 125-2 2 1 1 1 1 2 1 2 1 1 1 1 1 1 1 1 1 1 1 |
| Violation No. | 16 | erweine var of termelers on the labour stidios var | والمنافع والمعاول والمناف والفراة الرجوء | SECTION OF | | | Depreciation |
| | | | | de la refe | | 5.0 | 15 |
| | Item Cost | Date Required | Final Date | Yrs | Interest Saved | Onetime Costs | EB Amount |
| Item Description | No commission \$ | | DE PERMENTANTALISAS | | | | |
| | THE CONTRIBUTION OF THE PARTY O | | | 251200 | | removed a strip of the strip of | · · |
| | | | nice document des esta | | | rii ir | |
| Delayed Costs | Committee of the Commit | Hermony and the second second | | | 16, 778 CA A - 1000 CC | Andrews Andrews American | A Company of A Company of The |
| Equipment | | | | 0.00 | \$0 \$0 | \$0 | \$0 |
| Buildings | | 198 | | 0.00 | \$U \$0 | \$0 \$D | \$0 \$0 |
| Other (as needed) Engineering/construction | | September Val. Lat. | BURESCHIE BURE ALE | 0.00 | \$0 | \$0 | ※次× 50 |
| Engineering/construction Land | 50 10 10 10 10 10 10 10 10 10 10 10 10 10 | SELL Shirt pullment on exclusive (SM) SELL Shirt pullment on exclusive (SM) | itti ola 1966 ari 1960 ili menanggan. Pangganan kecampanan pendangan k | 0.00 | \$0 | | \$0 |
| Record Keeping System | Salari Carlo | | 2-1457-K 16 100-15 L4 | 0.00 | \$0 | n/a | \$0 |
| Training/Sampling | ALACIES PER | CONTROL OF THE CONTROL OF THE | DE ROCK DUPPLY HIS MATERIAL DE LA | 40.00 | \$0 | | \$0 |
| Remediation/Disposal | 25 455 7u | n in the contract of the in- | 27 | 0.00 | \$0 | 0/3 | · \$0 |
| Permit Costs | dyrest (car's) | | act = 0.0000 apt 0.00 kg/7. | 0.00 | \$0.00 | Extract n/a | \$0 |
| Other (as needed) | \$360 | 21-Jul-2010 | - 1-Jun-2011 | 0.86 | \$16 | Table over nVa | \$16 |
| Notes for DELAYED costs | | how to monitor t | he performance | of the | | to ensure that facili s; calculated from tholiance, | |
| Avoided Costs | ANNUAL | IZE [1] avoided | costs before | enteri | ng itém (except | for one-time avoi | ded costs) |
| Disposal | нфинациалізаці з ў Каўльні | The second secon | Markey Markey | 0.00 | \$0 | \$0 +2 | \$0 |
| Personnel | 建筑 数 15% 会元建筑 | ENDING THE SECOND | 12-17-1-17-17-18-172-1 | 0.00 | \$0 | \$0 | * × \$0 |
| Inspection/Reporting/Sampling | programme and the second | n indicator of major diagrams | | 0.00 | \$0.00 | \$0 (4 - 4 % | *** \$0 *** |
| Supplies/equipment | 400 - 400 e | y were the second of the second | | 0.00 | # **** \$0 | \$0>\$- | 50 S |
| Financial Assurance [2] | CANDON NA | | Exception-maintenance of the | 0.00 | 4.04.6 5 0,000.00 | \$0. | \$0 |
| ONE-TIME avoided costs [3] | ence de la companya | | | 0.00 | \$0≥ | \$0 - 80 | \$0 |
| Other (as needed) | | e etermination de la comme | Section Constitution of the | 0.00 | '÷ \$0 | \$0, *** | \$0 |
| Notes for AVOIDED costs | Section 1 | | g og selverist 1 grad – Jacob grad og storet Reposer der storet | | | | |
| Approx. Cost of Compliance | | \$360 |] | | IATOT | 7. X | \$16 |

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| Screening Date Respondent Case ID No. | City of Wills Point | Docket∈l | No. 2010-1721-MLM-E | • | (September 2002) |
|--|--|---|---|---|--|
| Reg. Ent. Reference No. Media [Statute] Enf. Coordinator | RN101388973 Public Water Supply Michaelle Sheriock | | | FLW KEVISIO | n October 30, 2008 |
| Violation Number Rule Cite(s) | P. CHARLES MONEY STREET, SEC. S. 10 S. N. | ex. Admin: Code § 290. | 121(a) and (b) | Sen, J. S. Lari | many principles way were |
| Violation Description | identifies all sampling loc analytical procedures monitoring regulterne observed that the mo monitoring sites and pr | ations, describes the sa and laboratories that th ents: Specifically, at the oltoring plan contained | ie Facility will use to com time of the investigation an outdated list of bacter g plan were located in fo | pecifies the ply with i, it was: :: riological? | note and the second |
| The second secon | | | Ва | se Penalty | \$1,000 |
| >> Environmental, Proper | Harm | r i | | 222 | 1.1 |
| Release OR Actual Potential | Major Modera | | Percent 0% | 6 | mygge, anguantejjim |
| >>Programmatic Matrix Falsification | Major Modera | | Percent 10% | | a consideration of the second second |
| Matrix Notes | Between 30% and | 70% of the rule regulre | ement was met. | | The second of th |
| | | | - Adjustment | \$900 | |
| • | • | | | | \$100 |
| Violation Events | | | | | A PRESENTA |
| Number of | Violation Events | | Number of violation | on days | m mali J. Lieb nga |
| mark only one with an x | daily weekly monthly quarterly semiannual annual single event x | | Violation B | ase Penalty | \$100 |
| | Qne si | ngle event is recommer | ided: | | |
| Good Faith Efforts to Com | iply 0 Before (| .0% Reduction NOV NOV to EDPRP/Settlen | nent Offer | | \$0 |
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| The state of the s | Notes The Re | spondent does not meet this viola | the good faith criteria f | or | |
| | | | Violat | ion Subtotal | \$100 |
| Economic Benefit (EB) fo | r this violation | | Statutory Lii | | |
| Estima | ted EB Amount | \$8 | Violation Final F | - | \$137 |
| | Th | is violation Final Asse | essed Penalty (adjuste | ea for limits) | \$137 |

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| Case ID No. | 40581 | | | | 323 | A St. Car Spill | |
| Reg. Ent. Reference No. | 5 | | | | or my | OL COLLEGE COLL | |
| | Public Water S | vlaan | | | <u> </u> | | Years of |
| Violation No. | | арріў | | | | Percent Interest | Depreciation |
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| | Item Cost | Date Required | Final Date | Yrs Inter | est Saved | Onetime Costs | EB Amount |
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| | The delayed | costs include the | estimated amo | unt to update | the monito | oring plan and make | maintain the |
| Notes for DELAYED costs | plan in an a | ccessible location | , calculated fron | the date of t | ne investio | ation when the viola | stion was first |
| | 20.73223000000 | | bserved to the | | | | V (V) (V) (V) (V) (V) (V) (V) (V) (V) (V |
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| Avoided Costs | | | | the recommendation of the contract of the | | for one-time avoi | |
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| Approx. Cost of Compliance | | \$45 | | THE TOTAL | TOTAL | 2 | \$8 |
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Compliance History Report

Customer/Respondent/Owner-Operator:

CN600665046

City of Wills Point

Classification: AVERAGE

Rating: 3.23

Regulated Entity:

RN101388973

CITY OF WILLS POINT

Classification:

Site Rating:

ID Number(s):

PUBLIC WATER SYSTEM/SUPPLY

REGISTRATION

2340005

WATER LICENSING

LICENSE

2340005

Location:

LOCATED NORTH OF US 80 & WEST OF FM 47 IN VAN ZANDT CO.

TCEQ Region:

REGION 05 - TYLER

Date Compliance History Prepared:

September 27, 2010

Agency Decision Requiring Compliance History: Enforcement

Compliance Period:

September 27, 2005 to September 27, 2010

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name:

Michaelle Sherlock

Phone:

(210) 403-4076

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period?

2. Has there been a (known) change in ownership/operator of the site during the compliance period?

No

- 3. If Yes, who is the current owner/operator? N/A
- 4. If Yes, who was/were the prior owner(s)/operator(s)?
- 5. When did the change(s) in owner or operator occur? N/A
- 6. Rating Date: 9/1/2010 Repeat Violator:

Components (Multimedia) for the Site:

Final Enforcement Orders, court judgments, and consent decrees of the State of Texas and the federal government. A.

Effective Date: 11/24/2005

ADMINORDER 2005-1179-PWS-E

Classification: Major

Citation:

30 TÁC Chapter 290, SubChapter F 290.113(f)(5)

5A THC Chapter 341, SubChapter A 341.0315(c)

Description: Exceeded the Maximum Concentration Level of 0.060 mg/L based on a running annual

average ("RAA") for haloacetic acids ("HAA5").

Classification: Major

Citation:

30 TÁC Chapter 290, SubChapter F 290.113(f)(4)

5A THC Chapter 341, SubChapter A 341.0315(c)

Description: Exceeded the Maximum Concentration Level of 0.080 mg/L based on a RAA for total

trihalomethanes ("TTHM").

В. Any criminal convictions of the state of Texas and the federal government.

N/A

C. Chronic excessive emissions events.

N/A

The approval dates of investigations. (CCEDS Inv. Track. No.) D.

> (481579)1 07/25/2006

> 2 05/22/2007 (560307)

> 3 11/14/2007 (600410)

> 4 07/01/2008 (684408)

> (710333)5 01/05/2009

> 6 05/20/2009 (688131)

> 7 09/24/2010 (844564)

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Date: 08/04/2006 (481579) CN600665046

Self Report? Classification: Minor

30 TAC Chapter 290, SubChapter D 290,46(m) Citation:

Failure to initiate maintenance and housekeeping practices to ensure the good Description:

working condition and general appearance of the system's facilities and

equipment.

Self Report? NO Classification: Minor

30 TAC Chapter 290, SubChapter D 290,42(d)(5) Citation:

Description: Failure to provide an operational flow measuring device to measure the treated

water discharged from the plant.

Self Report? NO Classification: Moderate

30 TAC Chapter 290, SubChapter D 290.42(d)(6) Citation:

Failure to provide adequate containment facilities for the fluorosilicic acid Description:

chemical tank.

Self Report? Classification:

Citation: 30 TAC Chapter 290, SubChapter F 290.121

Failure to have available a copy of the water system's Laboratory Approval Form Description:

(TCEQ-10450).

CN600665046 Date: 06/05/2007 (560307)

Self Report? NO Classification:

30 TAC Chapter 290, SubChapter D 290.42(d)(5) Citation:

Description: Failure to provide an operational flow measuring device to measure the treated

water discharged from the plant.

Seif Report? Classification:

30 TAC Chapter 290, SubChapter D 290.46(f)(3)(B)(iv) Citation:

Description: Failure to maintain backflow prevention assembly test and maintenance reports

for a minimum of three years. The regulated entity must provide these records to

Commission staff for inspection upon request.

CN600665046 Date: 07/02/2008 (684408)

Classification: Minor Self Report?

30 TAC Chapter 290, SubChapter D 290.46(f)(3)(A)(i) Citation:

Failure to maintain records of the amount of treatment chemicals used each day. Description:

Classification: Self Report? NO

Citation: 30 TAC Chapter 290, SubChapter D 290.46(f)(3)(A)(iv)

Failure to maintain records of the dates that dead-end mains were flushed. Description: Self Report? Classification: NO

30 TAC Chapter 290, SubChapter D 290.46(m) Citation:

Description: Failure to initiate maintenance and housekeeping practices.

Classification: Minor Self Report? NO

30 TAC Chapter 290, SubChapter D 290.46(s)(2)(A)(i) Citation:

Failure to calibration benchtop pH meters at least once a day. Description:

NO Classification:

Self Report? Minor 30 TAC Chapter 290, SubChapter D 290.46(s)(2)(B)(ii) Citation:

Failure to check the calibration of the benchtop turbidimeter with secondary Description:

standards each time a series of samples is tested.

Classification: Minor Self Report? NO

30 TAC Chapter 290, SubChapter D 290.46(s)(2)(B)(iv) Citation:

Failure to check the calibration of on-line turbidimeters at least once a week. Description: Self Report? NO Classification: Minor

30 TAC Chapter 290, SubChapter D 290.46(s)(2)(C)(i) Citation:

Description: Failure to check the manual disinfectant analyzers at least once every 30 days

with a chlorine solution of known concentration.

Classification: Self Report? NO

30 TAC Chapter 290, SubChapter D 290.46(s)(2)(C)(ii) Citation:

Failure to calibrate continuous disinfection residual analyzers at least once every Description:

90 days using chlorine solutions of known concentrations.

Classification: Minor Self Report?

30 TAC Chapter 290, SubChapter D 290.42(d)(11)(F)(iv)(II) Citation:

Failure to provide backwash facilities capable of expanding a dual media filter Description:

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bed, without air scour, at least 25% during the backwash cycle.

Self Report?

Classification:

Citation:

30 TAC Chapter 290, SubChapter D 290.42(d)(2)(E)

Description:

Failure to provide an air gapped connection on the filter-to-waste line. Classification:

Self Report?

30 TAC Chapter 290, SubChapter D 290.42(d)(5)

Citation: Description:

Failure to provide an operational flow measuring device to measure the treated

water used to backwash the filters.

Self Report? Citation:

30 TAC Chapter 290, SubChapter D 290.42(d)(6)

Description:

Failure to provide containment facilities large enough to hold the maximum amount of chemical that can be stored with a minimum of six inches of freeboard or hold

110% of the total volume of the chemicals stored.

Self Report? NO

Classification:

Classification:

Classification:

Classification:

Classification:

Classification:

Classification:

Minor

Citation:

30 TAC Chapter 290, SubChapter D 290,44(h)(4)

Description:

Failure to perform annual inspections and testing by a certified backflow

assembly tester on all backflow prevention assemblies.

Date: 01/08/2009

(710333)

CN600665046

Self Report?

Classification: 30 TAC Chapter 290, SubChapter D 290,46(f)(3)(A)(iv)

Description:

Failure to maintain records of the dates that dead-end mains were flushed.

Self Report?

Classification: 30 TAC Chapter 290, SubChapter D 290.42(d)(11)(F)(iv)(II)

Citation: Description:

Citation:

Failure to provide backwash facilities capable of expanding a dual media filter

bed, without air scour, at least 25% during the backwash cycle.

Self Report?

NO Citation:

30 TAC Chapter 290, SubChapter D 290.42(d)(2)(E)

Description:

Failure to provide an air gapped connection on the filter-to-waste line.

Self Report? NO

30 TAC Chapter 290, SubChapter D 290.42(d)(5)

Citation: Description:

Failure to provide an operational flow measuring device to measure the treated

water used to backwash the filters.

Self Report? NO Citation:

30 TAC Chapter 290, SubChapter D 290,42(d)(6)

Description:

Failure to provide containment facilities large enough to hold the maximum amount

of chemical that can be stored with a minimum of six inches of freeboard or hold

110% of the total volume of the chemicals stored.

Self Report? NO

Citation:

NO

30 TAC Chapter 290, SubChapter D 290.46(I)

Description:

Failure to flush at all dead end mains at least once per month.

Self Report? Citation:

30 TAC Chapter 290, SubChapter D 290.46(m)

Description: Self Report? NO

Failure to repair the rate-of-flow control valve on filter #2. Classification:

Citation:

30 TAC Chapter 290, SubChapter D 290.46(m)(5)

Description:

Failure to maintain the smaller up-flow clarifier free from excessive solids. Classification:

Self Report?

30 TAC Chapter 290, SubChapter D 290.46(s)(1)

Citation: Description:

Failure to calibrate rate-of-flow controllers and flow measuring devices at least

once every 12 months.

Self Report?

Classification: Minor

Classification:

Citation:

30 TAC Chapter 290, SubChapter F 290.121

Description:

Failure to maintain the monitoring plan up-to-date.

Self Report?

Citation:

30 TAC Chapter 290, SubChapter D 290.42(I)

Description:

Failure to compile a plant operations and maintenance manual.

F. Environmental audits.

N/A

Type of environmental management systems (EMSs). G.

N/A

H. Voluntary on-site compliance assessment dates.

N/A

i. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



| IN THE MATTER OF AN | § | BEFORE THE |
|---------------------|------------|-----------------------|
| ENFORCEMENT ACTION | § | |
| CONCERNING | . § | TEXAS COMMISSION ON |
| CITY OF WILLS POINT | § | |
| RN101388973 | § | ENVIRONMENTAL QUALITY |

AGREED ORDER DOCKET NO. 2010-1721-MLM-E

I. JURISDICTION AND STIPULATIONS

At its ______ agenda, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding the City of Wills Point ("the Respondent") under the authority of Tex. HEALTH & SAFETY CODE ch. 341 and the Tex. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent appear before the Commission and together stipulate that:

- 1. The Respondent owns and operates a municipal public water supply located north of United States Highway 80 and west of Farm-to-Market Road 47, Van Zandt County, Texas (the "Facility") that has approximately 1,895 service connections and serves at least 25 people per day for at least 60 days per year.
- 2. The Respondent has caused, suffered, allowed, or permitted the discharge of any waste or the performance of any activity in violation of Tex. WATER CODE ch. 26 or any rule, permit, or order of the Commission.
- 3. The Commission and the Respondent agree that the Commission has jurisdiction to enter this Agreed Order, and that the Respondent is subject to the Commission's jurisdiction.
- 4. The Respondent received notice of the violations alleged in Section II ("Allegations") on September 27, 2010.
- 5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.

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- 6. An administrative penalty in the amount of Fourteen Thousand Six Hundred Six Dollars (\$14,606) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). Two Thousand Nine Hundred Twenty-One Dollars (\$2,921) is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Agreed Order. The deferred amount will be waived upon full compliance with the terms of this Agreed Order. If the Respondent fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require the Respondent to pay all or part of the deferred penalty. Eleven Thousand Six Hundred Eighty-Five Dollars (\$11,685) shall be conditionally offset by the Respondent's completion of a Supplemental Environmental Project ("SEP").
- 7. Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.
- 8. The Executive Director of the TCEQ and the Respondent have agreed on a settlement of the matters alleged in this enforcement action, subject to the approval of the Commission.
- 9. The Executive Director recognizes that on July 26, 2010, the Respondent submitted documentation to demonstrate that the disinfectant residual was restored to a level greater than 0.5 milligrams per Liter ("mg/L") at Industrial Park and Eastside elevated storage tanks.
- 10. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Agreed Order.
- 11. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
- 12. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

II. ALLEGATIONS

As owner and operator of the Facility, the Respondent is alleged to have:

- 1. Failed to prevent an unauthorized discharge of sewage, municipal waste, recreational waste, agricultural waste, or industrial waste into or adjacent to any water in the state, in violation of Tex. Water Code § 26.121, as documented during an investigation conducted on July 21, 22, and 27, 2010.
- 2. Failed to provide an air gap connection to waste on the filter-to-waste connections, in violation of 30 Tex. Admin. Code § 290.42(d)(2)(E), as documented during an investigation conducted on July 21, 22, and 27, 2010.

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- 3. Failed to design the inlet and outlet of clarification facilities so as to prevent short-circuiting of flow or the destruction of floc, in violation of 30 Tex. ADMIN. CODE § 290.42(d)(10)(B), as documented during an investigation conducted on July 21, 22, and 27, 2010.
- 4. Failed to provide a rate of flow of backwash water that is at least 20 inches vertical rise per minute [12.5 gallons per minute ("gpm") per square foot] and usually not more than 35 inches of vertical rise per minute (21.8 gpm per square foot), in violation of 30 TEX. ADMIN. CODE § 290.42(d)(11)(F)(iii), as documented during an investigation conducted on July 21, 22, and 27, 2010.
- 5. Failed to provide backwash facilities capable of expanding a mixed-media filter bed without air scour at least 25% during the backwash cycle, in violation of 30 Tex. ADMIN. CODE § 290.42(d)(11)(F)(iv)(II), as documented during an investigation conducted on July 21, 22, and 27, 2010.
- 6. Failed to identify the influent, effluent, waste backwash, and chemical feed lines by the use of labels or various colors of paint, in violation of 30 Tex. ADMIN. CODE § 290.42(d)(13), as documented during an investigation conducted on July 21, 22, and 27, 2010.
- 7. Failed to provide a device on all chemical bulk storage facilities and day tanks that indicates the amount of chemical remaining in the facility or tank, in violation of 30 Tex. ADMIN. CODE § 290.42(f)(1)(C), as documented during an investigation conducted on July 21, 22, and 27, 2010.
- 8. Failed to provide adequate containment facilities for all liquid chemical storage tanks, in violation of 30 Tex. Admin. Code § 290.42(f)(1)(E)(ii), as documented during an investigation conducted on July 21, 22, and 27, 2010.
- 9. Failed to use a chemical feed system designed to minimize the possibility of leaks and spills and provide protection against backpressure and siphoning, in violation of 30 Tex. ADMIN. CODE § 290.42(f)(2)(D), as documented during an investigation conducted on July 21, 22, and 27, 2010.
- 10. Failed to maintain the Facility's operating records accessible for review during inspections, in violation of 30 Tex. ADMIN. CODE §§ 290.46(f)(2), 290.46(f)(3)(B)(vi), and 290.46(f)(3)(B)(v), as documented during an investigation conducted on July 21, 22, and 27, 2010.
- Failed to obtain prior approval from the Executive Director before using an alternative customer service inspection certification ("CSI") form, in violation of 30 Tex. ADMIN. CODE § 290.46(j), as documented during an investigation conducted on July 21, 22, and 27, 2010.
- Failed to initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the system's facilities and equipment, in violation of 30 Tex. ADMIN. CODE § 290.46(m), as documented during an investigation conducted on July 21, 22, and 27, 2010.

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- 13. Failed to inspect the interior coating of the elevated storage tanks for adequate protection to all metal surfaces on an annual basis, in violation of 30 Tex. ADMIN. CODE § 290.46(m)(1)(A), as documented during an investigation conducted on July 21, 22, and 27, 2010.
- 14. Failed to maintain all water treatment units, storage and pressure maintenance facilities, distribution system lines, and related appurtenances in a watertight condition and free of excessive solids, in violation of 30 Tex. Admin. Code 290.46(m)(4), as documented during an investigation conducted on July 21, 22, and 27, 2010.
- 15. Failed to properly calibrate equipment used for compliance testing, in violation of 30 Tex. Admin. Code § 290.46(s)(2), 290.46(s)(2)(A)(ii), and 290.46(s)(2)(B)(iv), as documented during an investigation conducted on July 21, 22, and 27, 2010.
- 16. Failed to maintain the residual disinfectant concentration within the distribution system at a minimum of 0.5 mg/L chloramine, in violation of 30 Tex. ADMIN. CODE § 290.110(b)(4), as documented during an investigation conducted on July 21, 22, and 27, 2010.
- 17. Failed to monitor the performance of the disinfection zones according to the Facility's most current monitoring plan and current disinfection contact time ("CT") study approval letter, in violation of 30 Tex. Admin. Code § 290.111(d)(2)(B), as documented during an investigation conducted on July 21, 22, and 27, 2010.
- 18. Failed to maintain an up-to-date chemical and microbiological monitoring plan that identifies all sampling locations, describes the sampling frequency, and specifies the analytical procedures and laboratories that the Facility will use to comply with monitoring requirements, in violation of 30 Tex. ADMIN. CODE § 290.121(a) and (b), as documented during an investigation conducted on July 21, 22, and 27, 2010.

III. DENIALS

The Respondent generally denies each allegation in Section II ("Allegations").

IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that the Respondent pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and the Respondent's compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: City of Wills Point, Docket No. 2010-1721-MLM-E" to:

City of Wills Point DOCKET NO. 2010-1721-MLM-E Page 5

> Financial Administration Division, Revenues Section Attention: Cashier's Office, MC 214 Texas Commission on Environmental Quality P.O. Box 13088 Austin, Texas 78711-3088

- 2. The Respondent shall implement and complete a SEP in accordance with Tex. WATER CODE § 7.067. As set forth in Section I, Paragraph 6 above, Eleven Thousand Six Hundred Eighty-Five Dollars (\$11,685) of the assessed administrative penalty shall be offset with the condition that the Respondent implement the SEP defined in Attachment A, incorporated herein by reference. The Respondent's obligation to pay the conditionally offset portion of the administrative penalty assessed shall be discharged upon final completion of all provisions of the SEP agreement.
- 3. It is further ordered that the Respondent shall undertake the following technical requirements:
 - a. Immediately upon the effective date of this Agreed Order, cease all unauthorized discharges from the surface water treatment plant lagoon and institute controls to prevent any future unauthorized discharges, in accordance with Tex. WATER CODE § 26.121.
 - b. Within 30 days after the effective date of this Agreed Order:
 - i. Inspect the interiors of all elevated storage tanks to ensure the interior coatings provide adequate protection to all metal surfaces, in accordance with 30 Tex. Admin. Code § 290.46;
 - ii. Begin maintaining the Facility's operating records, including but not limited to: backflow prevention test reports, and flow meter calibration reports, in accordance with 30 Tex. Admin. Code § 290.46;
 - iii. Initiate maintenance and housekeeping practices to ensure the good working condition and general appearance of the facilities and equipment, in accordance with 30 Tex. ADMIN. CODE § 290.46. This will include, but not be limited to the following corrective measures: repairing the corrosion and paint on the supply lines feeding the clarifiers, repairing or replacing the modulating valve on filter 1, removing all vegetation growing on the fence close to the old raw water intake, and repairing the containment structure for the caustic day tank;
 - iv. Begin using a customer service inspection certification form which provides the minimum information contained in 30 Tex. ADMIN. CODE § 290.47, Appendix D, in accordance with 30 Tex. ADMIN. CODE § 290.46;
 - v. Begin monitoring the performance of the disinfection zones according to the Facility's most recent monitoring plan and CT study, in accordance with 30 Tex. Admin. Code § 290.111. This will include, but not be limited to the following corrective measures: collecting disinfection residual

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- concentrations at all disinfection zones and adding chlorine upstream of the liquid ammonium sulfate ("LAS"); and
- vi. Properly calibrate equipment used for compliance testing, including but not limited to the following corrective measures: replace the expired pH buffers and fluoride secondary standards, verify the accuracy of the ammonia calorimeter against secondary standards, calibrate the online turbidimeters, and verify the fluoride test kit against secondary standards, in accordance with 30 Tex. Admin. Code § 290.46.
- c. Within 45 days after the effective date of this Agreed Order, submit written certification as described below in Ordering Provision No. 3.g, and include supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 3.a and 3.b.
- d. Within 60 days after the effective date of this Agreed Order:
 - i. Provide an appropriate air gap on the filter-to-waste connection at the surface water treatment facility, in accordance with 30 Tex. ADMIN. CODE § 290.42;
 - ii. Design the inlet and outlet of clarification facilities so as to prevent short-circuiting of flow or the destruction of floc, in accordance with 30 TEX. ADMIN. CODE § 290.42;
 - iii. Provide a rate of flow of backwash water that is at least 20 inches vertical rise per minute (12.5 gpm per square foot) and not more than 35 inches of vertical rise per minute (21.8 gpm per square foot), in accordance with 30 Tex. Admin. Code § 290.42;
 - iv. Provide backwash facilities capable of expanding the filtering bed during the backwash cycle, in accordance with 30 Tex. Admin. Code § 290.42;
 - v. Identify all settled water lines feeding the clarifiers and all of the chemical injection feed lines by utilizing labels or paint, in accordance with 30 TEX. ADMIN. CODE § 290.42;
 - vi. Install a level indicator on the 50% caustic bulk storage tank, in accordance with 30 Tex. ADMIN. CODE § 290.42; and
 - vii. Update the chemical and bacteriological monitoring plan so that it identifies all sampling locations, sampling frequency, and specifies the analytical procedures and laboratories the Facility will use to comply with the monitoring requirements, in accordance with 30 Tex. Admin. Code § 290.121.
- e. Within 75 days after the effective date of this Agreed Order, submit written certification as described below in Ordering Provision No. 3.g., and include supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 3.d.

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- f. Within 90 days after the effective date of this Agreed Order:
 - i. Remove all excess solids from the sludge lagoon and begin maintaining the lagoon so that it remains free of excessive solids, in accordance with 30 Tex. Admin. Code § 290.46;
 - ii. Provide adequate containment facilities, including secondary containment for the bulk alum storage tank and the LAS day tank, in accordance with 30 Tex. ADMIN. CODE § 290.42; and
 - iii. Provide a chemical feed system designed to provide protection against backpressure and siphoning, in accordance with 30 Tex. ADMIN. CODE § 290.42.
- g. Within 105 days after the effective date of this Agreed Order, submit written certification as described below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 3.f. The certification shall be notarized by a State of Texas Notary Public and include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

The certification shall be submitted to:

Order Compliance Team Enforcement Division, MC 149A Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78711-3087

with a copy to:

Water Section, Manager Tyler Regional Office Texas Commission on Environmental Quality 2916 Teague Drive Tyler, Texas 75701-3734

- 4. The provisions of this Agreed Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Facility operations referenced in this Agreed Order.
- 5. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a

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City of Wills Point DOCKET NO. 2010-1721-MLM-E Page 8

written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.

- 6. This Agreed Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
- This Agreed Order may be executed in separate and multiple counterparts, which 7. together shall constitute a single instrument. Any page of this Agreed Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or. otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Agreed Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms "electronic transmission", "owner", "person", "writing", and "written" shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.
- 8. Under 30 Tex. Admin. Code § 70.10(b), the effective date is the date of hand-delivery of the Order to the Respondent, or three days after the date on which the Commission mails notice of the Order to the Respondent, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

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City of Wills Point DOCKET NO. 2010-1721-MLM-E Page 9

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

| For the Commission | |
|--|--|
| For the Executive Director | 5/16/2011 Date |
| I, the undersigned, have read and understand thagree to the attached Agreed Order on behalf of do agree to the terms and conditions specified the accepting payment for the penalty amount, is mat | the entity indicated below my signature, and I erein. I further acknowledge that the TCEQ, in |
| additional penalties, and/or attorney fees, Increased penalties in any future enforcem | may result in: s submitted; eneral's Office for contempt, injunctive relief, or to a collection agency; nent actions; cal's Office of any future enforcement actions; y law. |
| Swift Mayor Signature Mayor Ma | 3-18-2011 Date |
| Scott Mc Guff Name (Printed or typed) Authorized Representative of City of Wills Point | Mayr |
| Instructions: Send the original, signed Agreed Order of Division, Revenues Section at the address in Section IV, Para | |

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Attachment A Docket Number: 2010-1721-MLM-E

SUPPLEMENTAL ENVIRONMENTAL PROJECT

| Respondent: | City of Wills Point |
|--------------------|---|
| Penalty Amount: | Eleven Thousand Six Hundred Eighty-Five Dollars (\$11,685) |
| SEP Offset Amount: | Eleven Thousand Six Hundred Eighty-Five Dollars (\$11,685) |
| Type of SEP: | Custom (Pre-Approved Concept) |
| Project Name: | Household Hazardous Waste, Electronics, and Appliance Collection Event |
| Location of SEP: | Van Zandt County |

The Texas Commission on Environmental Quality ("TCEQ") agrees to offset the administrative Penalty Amount assessed in this Agreed Order for Respondent to contribute to a Supplemental Environmental Project ("SEP"). The SEP Offset Amount is set forth above and such offset is conditioned upon completion of the project in accordance with the terms of this Attachment A.

1. Project Description

A. Project

Respondent shall hold a three-day event for the collecting, recycling and proper disposal of tires, electronics (including non-working televisions), appliances (without Freon) and household hazardous waste ("HHW") including, but not limited to, pesticides, herbicides, paint, various solvents, old batteries, and gasoline and oil products (the "Project"). Secure drop-off sites will be manned by City personnel, and a contracted Haz-Mat certified person to oversee the separation of the HHW material from the collected materials. The City will hire a waste disposal contractor to take the segregated waste to a TCEQ-approved facility located at 5100 Youngblood, Dallas, Texas. Manifests will be provided to show proper transport, recycling and disposal of collected materials.

Respondent shall ensure that the event:

- is advertised to the public; and includes a statement that the Project is being performed as a Supplemental Environmental Project
- occurs during the week and on a specified day of the weekend during daylight hours
- offers to the public a convenient drop-off location, and
- includes recycling of electronics, batteries, and tires

Respondent shall properly collect, transport, dispose of, or recycle the collected material. The SEP Offset Amount will be used for heavy equipment such as roll-off bins, vehicles, and trailers; public announcements of the event; and costs of proper disposal and recycling.

Respondent shall use the SEP Offset Amount only for the direct cost of implementing the Project and no portion shall be spent on administrative costs. The SEP will be performed in accordance with all federal, state, and local environmental laws and regulations.

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Respondent's signature affixed to this Agreed Order certifies that it has no prior commitment to do this Project and that it is being done solely in an effort to settle this enforcement action.

B. Environmental Benefit

The SEP will provide a discernible environmental benefit by providing a means of properly disposing of HHW and other waste, which might otherwise be disposed of in storm drains, the sewerage system, or other means detrimental to the environment and help rid communities of the dangers and health threats associated with non-regulated dumping.

The recycling portion of the events will include recycling of household E-waste materials. E-waste materials may include computers and related information technologies such as workstations, scanners, printers, hand-held diagnostic and screening tools, cell phones, servers, and televisions, among many others. Cathode ray tubes ("CRT") are the picture tubes in computers, monitors and TVs. With the rapid evolution of technology, computers and TVs containing CRTs become obsolete in a short period of time and are simply discarded, often in landfills. A typical 17-inch CRT contains approximately two pounds of lead and larger CRTs may contain up to ten pounds of lead. E-waste and contain lead, mercury, cadmium, hexavalent chromium and brominated flame retardants.

The SEP will also limit potential toxic or hazardous e-waste from the waste stream destined for disposal or incineration and to divert the e-waste to recycling. This will save valuable landfill capacity and allow the recycler to re-utilize e-waste components, including CRTs.

C. Minimum Expenditure

Respondent shall spend at least the SEP Offset Amount to complete the Project described above and comply with all other provisions of this SEP.

2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, Respondent shall begin implementation of the SEP. Respondent shall have completed the SEP in its entirety within 365 days after the effective date of this Agreed Order.

3. Records and Reporting

A. Progress Report

Within 30 days after the effective date of this Agreed Order, Respondent shall submit a Notice of Commencement to the TCEQ describing actions taken to begin the Project. Within 90 days of the effective date of this Agreed Order, Respondent shall submit a report detailing the progress made on the Project during the previous 60-day period and setting forth a schedule for achieving completion of the Project within the time-frame required in Section 2. *Performance Schedule*, above. Thereafter, Respondent shall submit progress reports to the TCEQ in the following increments and containing detailed information as set forth in the Reporting Schedule table below:

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Table 1: Reporting Schedule

| Days from Effective Order Date | Information Required | |
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| 30 | Notice of Commencement describing actions taken to begin project | |
| 90 | Actions taken during previous 60-day period to implement the project | |
| 180 | Actions taken during previous 90-day period to implement the project | |
| 270 | Actions taken during previous 90-day period to implement the project | |
| 365 | Notice of SEP completion | |

B. Final Report

Within 60 days after completion of SEP, and not later than 425 days after the effective date of the Agreed Order, Respondent shall submit a Final Report to the TCEQ, which includes:

- 1. A summary total of the amount of costs incurred;
- 2. An itemized list of expenditures and costs incurred;
- 3. Copies of invoices, paid receipts, checks, and other verifying documentation;
- 4. Copies of proof of advertisement of the collection event (the advertisement must include the statement that the SEP was performed as a result of a TCEQ enforcement action);
- 5. A certified/notarized statement of quantifiable environmental benefit;
- 6. Detailed map showing specific locations of the collection site(s);
- 7. Dated photographs of the Project showing the collected materials;
- 8. A count on the type of items collected, i.e. number of televisions, number of tires (by type, such as passenger, truck, etc.), number of appliances (by type), gallons of paint, etc.
- 9. Manifest sufficient to show proof of proper disposal and/or recycling of the collected materials.
- 10. Any additional information Respondent believes will, or that is requested by TCEQ to demonstrate compliance with this Attachment A.

4. Additional Information and Access

Respondent shall provide additional information as required by TCEQ staff and shall allow access to all records related to the receipt and expenditure of the SEP Offset Amount. Respondent shall also allow representatives of the TCEQ access to the site of any work being financed in whole or in part by the SEP Offset Amount. This provision shall survive the termination of this Agreed Order.

5. Failure to Fully Perform

If Respondent does not perform its obligations under this Attachment A in any way, including full expenditure of the SEP Offset Amount and submittal of the required reporting described in Sections 2 and 3 above, the Executive Director ("ED") may require immediate payment of all or part of the SEP Offset Amount.

In the event the ED determines that Respondent failed to complete the Project, Respondent shall remit payment for all or a portion of the SEP Offset Amount, as determined by the ED, and shall include on the check the docket number of this Agreed Order and note that it is for reimbursement of a SEP. Respondent shall make the check payable to "Texas Commission on Environmental Quality" and shall mail it to:

Texas Commission on Environmental Quality Litigation Division Attention: SEP Coordinator, MC 175 PO Box 13087 Austin, Texas 78711-3087

6. Publicity

Any public statements concerning this SEP made by or on behalf of Respondent, must include a clear statement that the Project was performed as part of the settlement of an enforcement action brought by the TCEQ. Such statements include advertising, public relations, and press releases.

7. Clean Texas Program

Respondent shall not include this SEP in any application made to TCEQ under the "Clean Texas" (or any successor) program(s). Similarly, Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

8. Other SEPs by TCEQ or Other Agencies

The SEP Offset Amount identified in this Agreed Order has not been, and shall not be, included as a SEP for Respondent under any other Agreed Order negotiated with the TCEQ or any other agency of the state or federal government.

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